
MODERN SLAVERY STATEMENT

This statement is made under the *Modern Slavery Act 2018 (Cth)*. It sets out the actions taken by Asurion Australia Pty Ltd ACN 155 388 275 (“**Asurion Australia**”), an entity registered in Australia, to address modern slavery risks in its operations and supply chain over its financial year ending 31 December 2020. Asurion Australia is committed to responsible sourcing and combating human trafficking and slavery in its operations and supply chain.

Structure, Operations and Supply Chains

Asurion Australia is part of the global Asurion Group and is ultimately owned by NEW Asurion Corporation, which is headquartered in Nashville in the United States (**Asurion HQ**). The Asurion Group has entities located in Europe, Latin America and the Asia Pacific region. Asurion Australia is a proprietary company registered in Australia and it does not own or control any other entities.

Asurion Australia is a leading provider of after sales services, trade-in and in-warranty services for mobile devices.

As at 31 December 2020, Asurion Australia had a workforce of 105 people, employed on either a permanent or fixed term contract basis. Employees are primarily based in Sydney and Melbourne but are also located in Adelaide and Brisbane.

Asurion Australia operates a warehouse facility in Regents Park, New South Wales, which is responsible for logistics and device restoration. Asurion Australia’s corporate office is located in Cremorne, Victoria. Asurion Australia’s customer base is also supported by an overseas call centre based in the Philippines.

Asurion Australia’s supply chain network includes:

- Postal network providers
- Authorised device repairers
- Telecommunication carriers
- Original equipment manufacturers
- Device monetisation partners
- Lawyers
- Accountants
- Security personnel

Risks of Modern Slavery Practices in Our Operations and Supply Chains

Asurion Australia has conducted a risk assessment to determine the risk of modern slavery practices in its operations and supply chain. Asurion Australia primarily sources goods and services from within Australia or from major global corporations through its direct supply chain. Asurion Australia has assessed the risk of modern slavery in its direct operations as low.

Asurion Australia engages its Australian based staff under employment contracts that are compliant with Australian law. Asurion Australia also engages device repairers who are Australian based. Other suppliers such as lawyers, accountants and security personnel are locally based and assessed as low risk.

Asurion Australia appreciates that there is an inherent risk of exposure to modern slavery and labour exploitation in connection with the purchase of electronic devices and equipment (particularly from overseas sources). Asurion Australia sources its devices from major international manufacturers with recognised brands under comprehensive contract conditions (the larger of which are managed on a global basis through Asurion HQ). Asurion Australia will carry out further analysis of these suppliers to consider the risks of modern slavery within their operations and supply chains to enhance its understanding of the risks attached to its device supply chain.

The call centre based in the Philippines is managed and operated by a sister entity to Asurion Australia, being an entity that is ultimately owned by Asurion HQ, and all employees are engaged pursuant to internal Asurion Group policies and paid above market salaries. Recruitment processes in the Philippines are equivalent to those adopted in Australia. Onsite inspections of the Philippines call centre are also carried out in relation to working conditions.

Assessing and Addressing Modern Slavery Risks in Our Business

In its 2020 financial year, Asurion Australia addressed risks of modern slavery in its operations and supply chain in the following ways:

- 1) **Supplier Code of Conduct:** Asurion Australia has a Supplier Code of Conduct (“**Supplier Code**”) that is applicable to all entities in our supply chain. The first section of the Supplier Code focuses on our prohibition on forced labour, with the second section detailing our opposition to the use of child labour. These topics occupy a pre-eminent position in the Supplier Code due to their importance to Asurion Australia and the Asurion Group globally. Suppliers are asked to report any potential violations of the Supplier Code to our ethics hotline (maintained by Asurion Australia’s parent company for all of its entities globally) and Asurion Australia retains the right to monitor facilities to ensure compliance with our Supplier Code.

If an entity fails to comply with the Supplier Code, Asurion Australia has the right to terminate its relationship with the supplier in order to remediate the situation. While there have been no instances of Asurion Australia rejecting a supplier in the last financial

year, Asurion Australia ensures it retains this right to enable it to take action if any concerns arise.

- 2) **Due Diligence:** A due diligence check is undertaken by internal compliance personnel prior to onboarding a new supply chain vendor to identify and assess the supplier including any modern slavery risks. For vendors supplying devices parts, part of this check is ensuring that the supplier has a valid and legitimate 'chain of custody'. That is, Asurion Australia will seek confirmation that the supplier is sourcing genuine parts directly from the original manufacturer (OEM), including evidence of a contract between the supplier and the OEM.

Asurion Australia also conducts an initial onsite inspection when onboarding a supplier to check for any modern slavery risks and compliance with the requirements of the Supplier Code.

- 3) **Supplier Contracts:** All of Asurion Australia's suppliers are provided with an Asurion drafted standard form agreement, which includes the Supplier Code of Conduct. Whilst the supplier can modify some clauses of the agreement, they cannot modify or omit the clauses pertaining to anti-bribery, ethics or Asurion Australia's right to audit for compliance with the Supplier Code of Conduct.

Asurion Australia's suppliers can be large global companies. Where the supplier is a large global company, the global relationship and supplier compliance is managed by Asurion HQ.

- 4) **Supplier Audits:** Asurion Australia carries out periodic audits on an ongoing basis (currently desktop audits, due to COVID-19 restrictions and concerns) on its suppliers. The frequency of audits is based on volume of supply, ranging from quarterly to annually. Regular Committee meetings are held to review any audit findings.
- 5) **Asurion Australia Employee Policies:** Within our own organisation, Asurion Australia has employment policies that outline our commitment to ethical principles and a safe and secure workplace for all of our employees. All employees are paid above market wages in all areas of the business. The same practice of paying above market salaries is observed in the Philippines, with salaries being benchmarked based on the relevant market.
- 6) **Asurion Global Code of Conduct:** The Asurion Group's Global Code of Conduct provides the bedrock for decision making at Asurion Australia. It establishes the common set of ethical principles and standards which guide our actions as we conduct business and serves as a resource for all Asurion Australia employees. These standards and principles include:
 - a focus on a safe and healthy working environment for our employees and our suppliers.

- a zero-tolerance stance on the use of child or forced labour, slavery, and human trafficking.

7) **Training & Employee Relations:** All employees complete compliance training on an annual basis that establishes Asurion Australia's position as an ethical workplace. Additionally, all Asurion Australia staff are recruited and reviewed through a formalised global process.

Effectiveness of Actions

Asurion Australia seeks to measure the success of the actions it is taking to reduce the risk of modern slavery in its operations and supply chain. It currently does this both through the audit framework mentioned earlier in this statement as well as through an enterprise risk management framework that has been established in Australia.

Additionally, Asurion Australia holds quarterly Risk & Compliance Committee meetings, attended by the Board and senior management of Asurion Australia. Matters monitored through this committee include Asurion Australia's regulatory compliance risk and remediation practices, work health and safety matters and program partner risks. Going forward, Asurion Australia will enhance its discussions on supplier risks and the effectiveness of actions taken to minimise those risks.

Approval of Statement

This statement was approved by the Board of Asurion Australia on 29 June 2021.

Asurion Australia looks forward to continuing to be part of the effort to combat modern slavery.



Grant Perrin
Director
Asurion Australia Pty Ltd