

AUB GROUP LIMITED  
MODERN SLAVERY  
STATEMENT  
DECEMBER 2022





# AUB GROUP LIMITED MODERN SLAVERY STATEMENT

## 1. Introduction

This Modern Slavery Statement (“Statement”) is made on behalf of AUB Group Limited and **its controlled entities (“AUB Group”, “Group”, “We”)** pursuant to the Modern Slavery Act 2018 (Cth) (the **Act**) for the period 1 July 2021 to 30 June 2022.

Our approach to Modern Slavery forms a key pillar of our Environmental, Social and Governance (**ESG**) program and the objective of ensuring AUB Group remains a socially and environmentally responsible organisation. AUB Group considers ESG from the perspectives of the environment, fair treatment of customers, employees and suppliers, ethical decision making and contribution to the community.

This Statement sets out the actions taken by AUB Group to identify, assess and address modern slavery risks across our operations and supply chains.

For non-controlled entities, AUB Group cannot direct or control the actions of those entities but will, as far as possible, educate, encourage and provide resources to assist those entities to manage their modern slavery risks.

This Statement was approved by the Board of AUB Group Limited on 16 December 2022.

## 2. Who we are and what we do – our structure, operations and supply chain

AUB Group Limited (ACN 000 000 715) is an Australian public company listed on the Australian Securities Exchange (ASX: AUB) and has its registered office at:

Level 14, 141 Walker Street  
North Sydney NSW 2060

AUB Group acquired Tysers on 30 September 2022. Tysers is a leading specialist international insurance broker based in London and the 6th largest wholesale broker in the Lloyd’s marketplace, writing annual gross premiums of AUD3.6 billion. The scope of this Statement does not cover Tysers given the transaction was completed after the reporting period. It is our intention to include Tysers in our Modern Slavery Statement for FY23.

AUB Group enables provision of services across Australia and New Zealand for insurance broking, agency, and distribution of ancillary products within the support services businesses. We operate in more than 520 locations in Australia and New Zealand. AUB Group’s network of insurance intermediaries conduct business with clients and other stakeholders both face-to-face and remotely. We maintain office space in the locations in which we operate and our team travels to these office locations and client venues.

AUB Group operates through four key business segments and its core revenue is derived from arranging insurance policies and from related products and services.

1

**Australia Broking** businesses provide insurance broking and advisory services primarily to SME clients. The division encompasses 45 broking businesses, complimented by established complimentary capabilities in Life Insurance Broking, Premium Funding, Claims Management, Legal Services, Loss Adjustment, and Investigations.

2

**In New Zealand**, AUB operates NZbrokers, the largest broker management group in NZ with 47 members (including 40 non-equity members). In addition, AUB Group has equity investments in 5 major broker partners, 2 underwriting agencies, and 1 platform.

3

**Australian Agencies** design, distribute and manage insurance products and portfolios via 31 agencies on behalf of locally licensed insurers and Lloyd's syndicates. Austagencies includes the 360 Underwriting and SURA Specialty portfolios.

4

**BizCover** is Australia's leading digital SME insurance platform with multichannel presence and comprehensive insurance offering. ExpressCover is an SME insurance platform utilising the BizCover quote and bind engine and exclusive to Austbrokers members. Investments underway in other Insurtech platforms to assist brokers and agencies.

AUB Group owns equity stakes in its partner businesses which provide trusted support and guidance to clients relating to physical, people and financial risks. This is backed by services the Group provides that help our partners operate with less risk, manage their businesses more profitably and ultimately achieve better client outcomes. We do not consume raw materials or manufacture any physical products so our environmental footprint and exposure to supply chain risk is limited to our direct operations.

Our strategic plan involves ongoing business improvement at the partner level through the delivery of enabling technologies, consolidation for scale and improved sector specialisation, together with an ongoing disciplined approach to mergers and acquisitions (M&A). Our partners are supported by broker value propositions and continually improving our partners' ability to win in the market.

## 2.1 Corporate Governance

The Board of Directors of AUB has overall responsibility for modern slavery risk management and guides and monitors the business and affairs of AUB on behalf of stakeholders and its activities are governed by the Constitution. AUB fully complies with the ASX Corporate Governance Council's Principles and Recommendations. The Board delegates operational responsibility to Senior Management for designing and implementing measures to prevent and detect modern slavery within the business and supply chain. Legal & Compliance has day-to-day responsibility for implementing these measures.

## 2.2 Our People

AUB recognises the importance of fostering a strong team of committed, enthusiastic and talented people who work hard together to deliver outstanding service to our clients and dynamic business results. Our culture supports and rewards those who excel in their field, take responsibility for their own actions, communicate openly, act with integrity and celebrate the success of the team as a whole.

## 2.3 Our Suppliers – Reach and Scale

<https://www.aubgroup.com.au/aub-group-overview/>

### Insurance Operations: Reach and Scale



During the reporting period, the global supply chain of AUB Group comprised approximately 3800 direct suppliers from a total of 14 countries, including Australia, New Zealand, United Kingdom, United States of America, Singapore, Netherlands, Ireland, Canada, Slovakia, Czech Republic, Sweden, France, Malta and South Korea.

Our suppliers are predominantly located within Australia and New Zealand.

Our supply chain includes suppliers of goods and services that contribute to general operations, including insurers, IT service providers, sponsorship and advertising agencies, consultancy and professional services firms, software, payroll & accounting, contractors & consultants, office supplies, catering, facilities maintenance, professional bodies, promotional & marketing, legal, human resources, accounting, travel, telephony, internet services, cleaning, waste management, manufacturers of uniforms or apparel, security service and training.

We reviewed our Primary Suppliers against modern slavery data and resources published by government, non-government and international organisations, such as:

- Walk Free Foundation;
- NSW Treasury – Economic Data Briefing: Global Supply Chains
- World Trade Organisation (WTO) – Global Supply Chains Forum
- Cambridge Universities Press – Sustainable Development Report 2022

## Map of Primary Suppliers



We recognise that as an organisation our suppliers are key to positively contributing to the social, economic, and environmental wellbeing of the communities that we are part of. Therefore an assessment of modern slavery risks forms part of our review of all potential supplier engagements.

We have key policies in place which sets out a framework of the ethical standards expected of all employees, directors and senior executives of the Company, and to manage modern slavery risk. These include (but are not limited to):

- Modern Slavery Policy
- Whistleblower Policy
- Anti-Bribery and Corruption Policy
- Diversity and Inclusion Policy
- Grievance Policy
- Code of Conduct

We also include standard ethical sourcing contractual clauses in all contracts where new vendors are engaged to provide services to AUB Group. We believe mutual commitments between AUB Group and our suppliers, to operate in accordance with community expectations of businesses, creates sustainable value for all our stakeholders. We work collaboratively with our suppliers to foster relationships that align with the standards in our governance framework and the interests of our stakeholders.

### 3. The risks of modern slavery in our operations and supply chains

We have focused on mapping the suppliers engaged directly by AUB Group to provide products and services to AUB Group (“**Primary Suppliers**”). 98% of Primary Suppliers are located in either Australia or New Zealand. Both jurisdictions are rated ‘low risk’ according to the internationally recognised Walk Free 2018 Global Slavery Index.

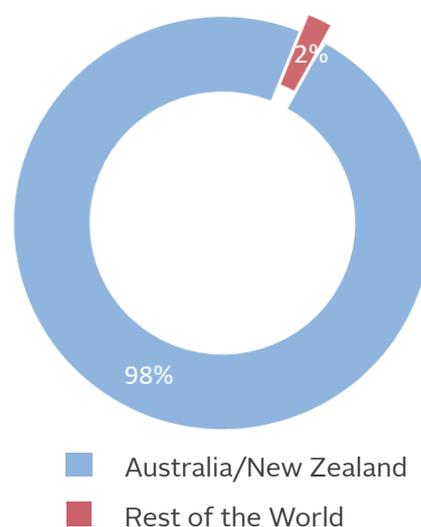
In conducting a review of our suppliers, we have considered the four key modern slavery risk indicators (geographic, industry & sector, product & services and supply chain model risks) and analysed those categories with more than AUD1 million spend in the reporting period.

#### Geographic risk

Some countries may have higher risks of modern slavery due to poor governance, weak rule of law, conflict migration flows and socio-economic factors like poverty. In analysing geographic risk, we have referred to estimated prevalence of modern slavery and the government responses as outlined in the 2018 Global Slavery Index (GSI) and its published country risk matrices.

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We note that whilst almost all of our suppliers operate directly from Australia, their supply chain may extend to overseas countries considered higher risk of modern slavery by the GSI and other human rights indices.



#### Sector and Industry risks

Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes. This could include the use of unskilled, temporary, seasonal labour or foreign workers. This also includes the recruitment strategies by suppliers, their agents or labour hire agencies.

AUB Group operates in Australia and New Zealand within the highly regulated financial services sector, which feature labour and award safeguards for employees, as well as safe working environment protections.

We consider the risk of modern slavery occurrences within our direct employee workforce to be low, due to both the industry and jurisdictions in which we operate in presenting a low inherent risk of forced labour, child labour and other forms of modern slavery.

The key factors that support a low risk rating in the professional services industry include the office-based nature of work, low proportion of characteristically vulnerable workers typically found within the workforce and the higher level of skill required to perform the work within the financial services sector.

We work with a selected panel of recruiters for recruiting individuals. AUB Group Limited (our listed parent entity) conducts reference and other relevant checks before formally extending offers to its employees which helps us to understand any areas of potential vulnerability. All non-workforce contractors of AUB Group Limited undergo relevant screening through their respective service provider, and relevant certifications are obtained prior to them commencing any work.

## Product and services risk

The financial services sector intersects with a range of modern slavery risk areas through its investments, assets, insurance and procurement supply chains. AUB Group conducted a self-assessment to determine whether AUB and its controlled entities source goods from high risk or restricted jurisdictions. AUB does not have a direct relationship with suppliers in the growing, mining or manufacturing industries which are considered high risk industries in Australia.

## Supply chain model risk

The review of our modern slavery practices considers the risk to people rather than just the risk to our business. Further information has been provided in our Environmental, Social and Governance Report which forms part of our 2022 Annual Report and is available on our website.

Some instances were found of where our controlled entities utilised sub-contractors, with one of the sub-contractors, an established provider of administration services based in Malaysia. The rest are located in Australia. A review was undertaken of these entities, including location, products and services, and contacting the suppliers directly to obtain information on modern slavery and adverse media checks. No instances of misconduct were identified.

For AUB's direct suppliers, AUB has contractual provisions to ensure that modern slavery rules are not violated and that the wages meet applicable host country legal requirements.

We recognise the potential for indirect exposure to modern slavery risks in our supply chains through suppliers with whom AUB Group does not maintain a direct relationship (i.e., indirect procurement such as supplier sub-contractors and others further down the supply chain where AUB Group entities do not have as clear visibility or control). Taking a prioritised risk-based approach, AUB Group has focused in this Statement predominantly on its Primary Suppliers.

A summary of the results is as follows:

	Potential high risk	Potential medium risk	Potential low risk	Total
<b>% of spend</b>	0.3%	8.8%	90.9%	100%
<b>Supplier (number) in top 80% spend</b>	303	478	1295	2076
<b>Spend categories</b>	Hospitality and Cleaning	IT consumables, skilled labour, human resources & employee management	Insurance, professional services and other	

Based on our analysis, there is *potential* risk of modern slavery in our supply chain.

- 0.3% of spend analysed is potentially high risk, primarily due to industry risk (cleaning is potentially high risk due to potential exploitation of cleaners). One supplier was identified as using a sub-contractor based in Australia.
  - The commercial cleaning industry in Australia is at risk of modern slavery due to the prevalence of labour hire arrangements, formal and in-formal subcontracting and the high number of migrant workers.

- After a desktop review and further analysis of the supplier, there were no identified instances of exploitative practices or human rights abuses.
- As all the suppliers are all based in Australia and New Zealand, we are comfortable with the level of risk as both these countries overall are considered low risk and have modern anti-slavery practices in place.
- Of the suppliers in the medium risk category, six suppliers were identified as medium risk due to geography and product & industry risk.
  - One supplier was based in Malaysia and provides offshore employee management services.
  - Rapid development of the economy in Malaysia has created new markets for people seeking economic opportunities. These trends have created a pool of vulnerable migrants as well as opportunities for those who would seek to make money through exploitative practices, including forced labour, debt bondage, and forced sexual exploitation.
  - After a desktop review of the supplier, no identified instances of exploitative practices or human rights abuses were found. The nature of work is specific to administrative services. AUB has contractual provisions in place to ensure that the wages meet the applicable host country legal requirements, and the entity abides by the modern slavery laws and has a modern slavery statement in place.

For the financial year ending 2022 we undertook a supplier and category risk prioritisation to identify major supply categories and suppliers that potentially are at risk of modern slavery. This important step provides us with a baseline for our risk management program and informs ongoing risk assessments and supplier due diligence planned for the next reporting period.

AUB Group considers that the risk of modern slavery in the operations in our supply chain and that of our major insurer partners is low, on the basis of the highly regulated environment and markets in which they operate, as well as their publicly stated commitment to Environmental, Social and Governance (ESG) responsibility.

For the reportable period, 1 July 2021 to 30 June 2022, there were no identified instances of exploitative practices or human rights abuses in our supply chain.

## Impacts of COVID-19

The recent geopolitical events at a global scale combined with the impacts of COVID-19 have seen labour shortages in some industries. Whilst the finance industry as a whole and AUB Group has not been strongly impacted by the labour hire shortage, this is a metric that we are closely monitoring and remain alert to the potential for any future operational impacts.

## 4. The actions taken by us to assess and address these risks

AUB Group Limited (our listed parent entity) takes a systematic approach to assessing modern slavery risks. AUB Group Limited ensures that it remains compliant with modern slavery requirements and educates, encourages and provides resources (including self-certification) to support compliance by controlled entities with modern slavery requirements.

As our approach to addressing modern slavery risk matures, we will continue to develop systems, controls and processes to assess and further develop the effectiveness of our risk management framework, including in respect of controlled entities. AUB Group has implemented compliance measures to assess and review potential risks.

The AUB Group Board Audit and Risk Committee has responsibility for overseeing the Group's response to modern slavery risks. Modern slavery risk management is discussed by the Group Board and the Group Board Audit and Risk Committee.

## 4.1 Actions taken in the last 12 months

### Category: Governance



#### Risk & Compliance Management Framework

AUB Group has an enterprise-wide Risk & Compliance Management Framework in place. To complement this framework and demonstrate compliance with modern slavery requirements and obligations, the Group has enhanced and developed further policies in addition to our current controls. These policies and procedures promote and instil good practices and behaviours and protect the human rights of our employees and suppliers.

- Environmental, Social and Governance Policy
- Customer Vulnerability Policy
- Grievance Policy

The Group Audit and Risk Committee receives regular reporting on modern slavery risk management. The AUB Group Leadership Team reviews emerging risks and opportunities in monthly Risk Management Executive Committee (RMEC) meetings, leads stakeholder engagement and facilitates the sharing of best practice throughout the Group. Each Group subsidiary management team has responsibility for identifying and managing any material risks in accordance with the Group's procurement standards and delegate authority matrix.



#### Ethical and Responsible Behaviour

AUB Group's Code of Conduct (Code) sets out the ethical standards expected of all directors, officers, and employees of AUB Group and its controlled entities. AUB Group encourages any businesses in which AUB Group has a non-controlling interest to adopt the Code. The Code is designed to ensure AUB Group delivers on its commitment to corporate responsibility and sustainable business practice. It establishes a foundation for our business decisions and provides guidelines for ethical behaviour.

The Code requires our people to act with honesty and integrity in dealing with all stakeholders, including suppliers, and comply with the law. All employees are required to attest to their adherence with the Code and undergo online compliance training for this annually.



#### Review of Modern Slavery Processes

In 2022, AUB Group incorporated a review of modern slavery processes across its broker network as part of its Annual Assurance Program which directly aligns to the Group's Risk Appetite Statement (RAS). The review was designed to gather information from the partner businesses regarding their understanding of modern slavery practices, self-identification of training requirements and how the partner businesses onboard suppliers e.g. the types of due diligence checks that are conducted, any ongoing checks and record keeping methodologies. Directors, senior management, operational and compliance personnel were interviewed as part of this process.

Further work has been done in training staff in our controlled entities to recognise and identify instances of modern slavery. As part of our review process and working together with AUB's Compliance Team, Controlled entities have contributed to this Statement by providing information on their own due diligence checks conducted on suppliers, especially where they utilised sub-contractors.



#### Whistleblower Policy and Grievance Process

AUB Group maintains a Whistleblower Policy that seeks to promote proper and ethical professional conduct in the workplace. Employee understanding and awareness of this policy is achieved through e-learning modules which promotes awareness and encourages communication.

In addition, we maintain an anonymous and confidential whistleblower hotline, as well as comprehensive measures to ensure whistleblower protection.



## Whistleblower Policy and Grievance Process (continued)

As part of our broader ESG approach, AUB has implemented a Grievance Form on its public website to make the grievance process accessible to the general public, its group and network members. Submissions are jointly reviewed by the Group's General Counsel & People and Culture Team on any grievance matters. This tool is designed to pro-actively manage a range of issues including mismanagement across the decentralised Group. Although these issues may not constitute whistleblower events, we believe it is best practice to enable them to surface and be dealt with.

We communicate procedures to employees and provide regular progress reports regarding individual grievance cases to our senior management and Board Audit and Risk Committee.



## Corporate Sustainability and Responsibility

AUB Group places significant importance on managing sustainability and believes sustainability related issues extend beyond climate to include corporate social responsibility, culture, governance, and accountability. We are committed to ensuring that high corporate governance standards are upheld by us.

Our Environmental, Social and Governance Policy and ESG Report sets out our commitments to operate in a way that is economically, socially, and environmentally sustainable.

- **Ethical sourcing contractual clauses**  
Standardised clauses included in all contracts where new vendors are engaged to provide services to AUB Group. As part of the overall governance process, periodic reporting and updates are provided to the Executive and Board Committees on modern slavery risks and compliance related matters.
- **Assessing our internal operations and recruitment practices**  
AUB Group has a process governing the appointment of directors, senior executives as well as all other staff members and contractors. Each of the directors and senior executives is screened for matters of skill, character, experience, education, criminal record and bankruptcy history.

Over this reporting period, we have made significant progress in implementing policies and actions to assist in addressing the modern slavery risks associated with our operations and supply chains. These include reviewing and where necessary updating due diligence procedures, introducing a requirement for statements contractual clauses specifically related to Modern Slavery to be included in agreements; and introducing grievance channels.



## Communication and Raising Awareness

We communicate regularly to raise awareness of modern slavery risks, including through training and by sharing our annual Modern Slavery Statement.

We utilise various channels to keep all staff within AUB Group informed on key policies and processes to encourage their interest, buy-in and input. This includes regular communication bulletins, quarterly meetings, informal sessions with the Group Risk & Compliance Team and via our online broker portal. Furthermore, we hold formal and informal meetings with our top suppliers including IT, product suppliers and insurance underwriters.

Any training material related to key policies are operationalised by way of mandatory training and baseline score to meet minimum standards in order to demonstrate understanding and competence. The training programs also have a set time frame for completion and completion rates are tracked and monitored.



## Reporting, Internal Accountability and Remediation

A centralised reporting tool is used to manage complaints and breaches, along with a secondary reporting tool for the purposes of whistleblower and grievance matters. These reporting mechanisms help us effectively maintain oversight and respond to any matters that may pose a risk to our people or our business.

Our grievance form is located on our website for employees and members of the network to report any matter without fear of retaliation. This reporting line is managed by our Group General Counsel and People and Culture Team and escalated to our management committees and Board Audit & Risk Committee as required.

We have agreed principles in place for remediation should any incidents be identified.

## Category: Supplier Assessment



### AUB Group's Vendor Management

To mitigate the risks of modern slavery across its supply chains in all forms, the Group has developed internal processes to conduct due diligence on new suppliers engaged by the Group. Key risk considerations include:

- Sector and industry risks
- Product/ service risk
- Geographic risk
- Regulatory contraventions
- Corporate governance

The due diligence enables AUB to complete a comprehensive check across various areas including the company's directors and operations, review of key policies and procedures, Information Technology and Security review and Corporate Social Responsibility questions included as part of our process.

Further to the due diligence checks conducted, AUB Group incorporates key contractual clauses in vendor contracts. A template appendix of key contractual clauses has been developed which sets AUB's minimum expectations and compliance arrangements.



### External Review of Key Suppliers

AUB Group has engaged an external entity to review its key supplier contracts and align contractual standards with AUB's minimum compliance requirements. This work is currently ongoing.



### Supplier Chain Assessment

As part of our standard procedures and onboarding process, a supplier due diligence assessment is required for all new and current suppliers of AUB Group Limited (our listed parent entity). This supplier due diligence assessment takes the form of a supplier self-assessment and covers a range of issues. In respect of our controlled entities, we developed and distributed standardised questionnaires to collect supply chain data from our network and collate a supplier database for our assessment purposes.

AUB Group obtains supply chain information in respect of each supplier:



## Supplier Chain Assessment (continued)

- country of incorporation;
- country of operation;
- operation sector;
- ultimate parent company;
- annual spend amount and payment type, e.g., cash transactions;
- whether supplier has any local registrations, e.g., ABN;
- whether supplier has an ongoing supply contract with AUB Group; and
- whether supplier uses labour hire and/or immigrant workers.

The information obtained from this supply chain assessment is cross-referenced against modern slavery data and resources published by government, non-government and international organisations to highlight potential modern slavery issues that warrant further assessment.

A risk assessment of the data is conducted to assess and identify any trigger points, along with countries and provinces that are considered high risk. The data utilised for our assessment purposes considers compliance efforts under a global reporting framework which also includes consideration of major supply chain related slavery and human trafficking regulations across US, UK, EU, France, Australia and Canada.

## Category: Internal Awareness, Education and Training



### Training Structure

AUB Group has partnered with a Registered Training Organisation (RTO) to raise awareness about modern slavery, train and build the capacity of our network on how to recognise and respond to modern slavery in their roles. Our training programs support employees with knowledge and tools to play their part in helping to address Modern Slavery across our business operations and supply chain.

To meet our specific business needs and educate our network, the AUB Group designed a modern slavery training program contextualised to our environment. Through this online training program, we are able to target the training to varying levels within our organisation and to that of our network, depending on need, from those in compliance and risk roles through to the executives.

All training programs are housed in our online Learning Management System (LMS) and online broker tools. The programs consist of questionnaires, which test the users knowledge and understanding regarding subject matter and tailors the video content to the users response. Training on key policies, including refresher courses is rolled out periodically as per our training plan.

The average completion rate for the following key training courses rolled out in 2022 was 87%.

- Combatting Modern Slavery
- Director Responsibilities & Duties
- Mental Health in Your Workplace
- Whistleblower



### Modern Slavery Training

AUB Group launched the next phase of its modern slavery training in FY22 (Combatting Modern Slavery) to targeted individuals. This course was designed to help those in leadership, management, procurement and risk management roles who are involved in identifying, assessing and addressing modern slavery risks. The course defines modern slavery, describes the impacts modern slavery has on an organisation, identifies ways to mitigate the risks, and explains how to report on modern slavery within your organisation's operations and supply chains.



## Director Training

In April 2022, AUB Group developed training courses targeted at directors of both controlled and non-controlled entities in connection with modern slavery.

The course captured:

- Overview of role of directors
- Director duties relating to due care and diligence, acting in good faith, use of position, and disclosing personal interests.
- Solvency, Financial Benefits, Advice and Delegation
- Consequence management – liability and civil and criminal penalties for breaching directors' duties.

## 4.2 Planned focus areas for the next 12 months and beyond

We have identified priority activities for FY23 and beyond across our head office and the broader Group, whilst applying a materiality lens and considering the priorities of our stakeholders. We understand the evolving landscape and the greater responsibility businesses owe to all stakeholders.

Focus area	Actions	Measuring our effectiveness
<b>Review of modern slavery policy</b>	Review of Modern Slavery Policy to align with future business acquisitions and Walk Free's Modern Slavery Response & Remedy Framework.	<ul style="list-style-type: none"> <li>• Policies, procedures and practices reviewed in line with plans and communications with employees and suppliers</li> </ul>
<b>Enhancing training delivery</b>	Minimum of 20 hours training in addition to ethics training for all AUB Group head office staff facilitated by the new Learning and Development platform.	<ul style="list-style-type: none"> <li>• Training completion rates</li> <li>• Audit review outcomes</li> </ul>
<b>Focus on staff wellbeing</b>	Uplift processes to focus on staff wellbeing, including rollout of a donation and volunteering model	<ul style="list-style-type: none"> <li>• Absenteeism being under 5%</li> <li>• Training completion rates</li> <li>• External reviews – ESG rating agency tracking + Great place to work results</li> </ul>
<b>Gender equality targets</b>	Assess strategic measures to be implemented to achieve long term gender balance objective of 40/40/20 (40% men, 40% women and 20% open), and eliminate gender wage gap.	<ul style="list-style-type: none"> <li>• Training completion rates</li> <li>• External reviews – ESG rating agency tracking + Great place to work results</li> <li>• Gender pay gap analysis + WGEA benchmarking of level split by role traction</li> <li>• Modern slavery / fair remuneration – Monitoring of minimum wage versus liveable wage low water mark</li> </ul>
<b>Supplier chain risk assessment</b>	Implementing more sophisticated tools and technology to conduct multi-tiered supplier risk assessments enabling easier comparison of supplier risks and allowing for more accurate classification of risk by supplier. The future supplier assessments will rely on global trade data and respected data sources for modern slavery and environmental foot printing, allowing us to formulate appropriate risk mitigation strategies.	<ul style="list-style-type: none"> <li>• Number of initial risk assessments conducted on Tier 1 suppliers</li> <li>• Number of breaches identified to the Board &amp; Audit Risk Committee</li> </ul>

## 5. Assessing the effectiveness of our actions

We will use indicators to measure how effective our actions are to identify and address modern slavery practices in any part of our operations. Over our last reporting period, we assessed the effectiveness of our actions across four key areas:

- Governance & due diligence;
- Procurement & supply chain;
- HR practices, training & education;
- Grievances and reporting.

Against each of these focus areas we have developed indicators that we will use to assess the effectiveness of our actions. These include the:

- New vendor assessment completion rates
- Percentage of precedent contracts with modern slavery clauses included
- Percentage of precedent contracts with modern slavery clauses included
- Completion rates for modern slavery awareness training; and
- Number of supplier or staff grievances raised and remediated
- Number of claims of bullying, harassment other material breaches of AUB Group's Code of Conduct

Over subsequent reporting periods, we will continue to review and enhance these indicators and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement.

## 6. Our consultation process

AUB Group is committed to creating and sustaining a business-wide approach to assessing and addressing modern slavery risks. AUB Group has consulted with its key controlled entities and fully owned subsidiaries to develop its Modern Slavery Statement, including by briefing relevant company directors, compliance and operations personnel.

Various business lines and functions within the Group are consulted to provide input into this statement on an annual basis, including Legal, Risk & Compliance (including New Zealand counterparts), Procurement, Human Resources and Financial Controls. Accordingly, these internal stakeholders provided input in relation to improved internal processes for supplier management, onboarding processes, recruitment processes and gathering information from our controlled entities on supplier risk assessments.

AUB Group has obtained insights from reviews undertaken by external providers benchmarking AUB against its industry peers. These insights have supported AUB in developing further effective solutions in relation to this Statement. The Group Risk & Compliance Team also engaged with its industry peers and participated in industry forums and workshops hosted online.

AUB Group aims to continuously improve and enhance its practices within business operations and supply chains, and continue its consultation and engagement process through:

- **Collaboration with Network Partners** – AUB Group is continuing to build more leverage into its business relationships by collaborating with other stakeholders to build a shared understanding of the harm and identify opportunities for a collective response.
- **Building meaningful relationships with suppliers** – ongoing engagement with key suppliers
- **Pool leverage** – to bring in the reach of multiple internal stakeholders to influence an informed roadmap for the future through our ESG action items.
- **Regularly communicating expectations and standards of ethical workplace practices** – through training programs and other internal forums
- **Industry engagement** – collective action to strengthen standards by participating in specific industry forums
- **Uplifting modern slavery risk management** by reviewing direct suppliers and third parties to ensure that established procedures are being followed
- **Continuing to raise awareness** and deliver modern slavery training across the business

As part of the consultation process, this statement was reviewed by group executives responsible for overseeing the business operations of AUB Group.

## 7. Board approval

This Modern Slavery Statement was approved by the Board of AUB Group Limited on 16 December 2022.

Signed for and on behalf of the Board of AUB Group Limited.

A handwritten signature in black ink, appearing to read 'D Clarke', is positioned above the printed name and title.

David Clarke

**Chair of AUB Group Limited Board**

16 December 2022

