



*Anti-slavery and human
trafficking statement for period
1 January to 31 December 2023*

Sedgwick Australia

Statement from our CEO

At Sedgwick Australia our purpose is [Caring Counts](#) and taking care of people is at the heart of everything we do. We are committed to respecting human rights and protecting people against modern slavery in Australia and globally.

This Modern Slavery Statement provides an overview of how we continue to mature in understanding the risks of modern slavery operations, by assessing, documenting and categorising the key risks in our supply chain.

At Sedgwick, we are committed to continuously strengthening our approach to identifying and managing modern slavery, as well as reporting on our progress. The below infographic highlights how we have strengthened our level of Modern Slavery Framework in 2023 and will continue to build on this in our plan 2024.

2023

In 2023, we focused on uplifting our Modern Slavery framework through the following:

- Annual review, and ongoing enhancement of our existing policies
- Update of our Risk Register with modern slavery considerations
- Integration of Modern Slavery criteria into our risk management activity throughout our operational supply chains
- Review and update of our supplier contracts to reinforce our requirements on the prevention of slavery and human trafficking in Sedgwick's supply chain
- Enhancement of our supplier onboarding and annual declaration process in line with the ongoing development and evolution of our ESG program

2024

In 2024, we plan to enhance our Modern Slavery Framework through the following:

- Revising the Supplier onboarding questionnaire
- Working collaboratively with our Suppliers on their own Modern Slavery risk identification and uplift knowledge through a Modern Slavery Factsheet
- Expanding our top supplier risk assessment to ensure greater coverage of our supply chain
- Establishing our Sedgwick Supplier Code of Conduct
- Explaining our approach to investigating and where appropriate remediating potential modern slavery incidents

We are dedicated to respecting human rights and continue to support the eradication of all forms of Modern Slavery. Together with the Board and Executive Leadership Team, I remain committed to the ongoing improvement of our approach to managing modern slavery at Sedgwick Australia.



Diego Ascani
CEO and Board Director
Sedgwick Australia | June 2024

Purpose and summary

Sedgwick Australia has prepared and issued this statement to address global concerns regarding Modern Slavery. Multiple laws and regulations have been published such as, but not limited to, the UN Global Compact, the Modern Slavery Act 2015 (UK), Corporate Duty of Vigilance Law 2017 (France), and the Australian Modern Slavery Act 2018 (Cth) (the Act).

This is a joint Statement covering Sedgwick Australia's and its reporting entities, in compliance with the Act. Other than the entities details, no other Sedgwick Australia controlled entity meets the reporting criteria under the Act. The entities are incorporated in Australia.

This statement sets out the steps taken by Sedgwick Australia Pty Limited (ACN 003 437 161) and the entities it owns and controls (Sedgwick Australia) refer Appendix A, to prevent modern slavery and human trafficking occurring within our business and our supply chain in compliance with Section 16 of the Act.

Sedgwick Australia provides direction to the entities it owns and controls regarding the management and implementation of modern slavery measures aligned to the approach of Sedgwick International. Accordingly, this statement covers the steps taken by Sedgwick Australia and its subsidiaries only.

Our ethics, values and standards are the foundation of the way we conduct our business. Sedgwick is committed to preventing acts of slavery and human trafficking from occurring within our business and supply chain. We also expect the same commitment from our employees and suppliers.

As a professional services provider in Australia we recognise that slavery and human trafficking exist in the modern world, and that it is a global and growing issue. We, and all of our employees, together with those who work with and on behalf of the Group, have a responsibility to ensure no form of slavery or human trafficking exists in our business, our supply chain, or the supply chains of those with whom we choose to partner.

We expect our people, or anyone working with or on behalf of Sedgwick, to raise any concerns they have using the designated reporting channels, so that we can take appropriate action.

Structure of the organisation

Sedgwick Australia is an operating division of Sedgwick International. At time of publishing this statement, Sedgwick Australia has 668 employees across its 22 offices in Australia, with its head office located in Sydney. Sedgwick Australia's primary operations and services reflect those of the Group.

The Sedgwick Group is a leading global provider of integrated, technology-enabled, business solutions primarily for the investigation and resolution of insurance claims. We have a broad range of resources which we use to tailor our services to our insurer clients' specific needs in property, casualty, marine, benefits and other lines.

For more than 50 years we have been committed to doing the right thing. We do that by living our core values of empathy, accountability, inclusion, collaboration and growth. Our 33,000 colleagues across 80 countries embrace our shared purpose and values as they demonstrate what it means to work for an organisation where *caring counts*. Through the experience and expertise of our colleagues, we work to remove process complexity, to enable us to provide an efficient, customer-focused service which meets the needs of our clients and their customers.

Our operation includes several businesses, working on all parts of the risk life cycle, including pre and post loss. These include experts in surveying, engineering, construction, forensic accounting, telehealth solutions, absence and injury management programs, training, fire origin, environmental risk, and contractor management. Some of these experts will visit claim locations to assess loss/ damage and to agree the necessary remediation work. During such visits they will engage with other parties, including our appointed suppliers, and experts appointed by other interested parties. Other colleagues handle claims remotely, either from an office or their own homes. Such handlers will interact with suppliers by email or telephone but will not meet with them.

To deliver our services we work with a range of suppliers. Some of these provide services that support the Group and our colleagues (e.g. IT services and support functions). Others provide services that align with either our investigation of claims (e.g. medical experts) or the fulfillment of claims (e.g. building contractors). Some of these suppliers' contract with us for the services they provide, but others are either acting on behalf of the insurer we are appointed by, or our client's customer.

We seek to ensure that the way in which we choose our business partners, and purchase goods, services and facilities, reflects our commitment to environmental, social and governance (ESG) matters, including the prevention of slavery and human trafficking.

To find out more about the nature of our business, please go to www.sedgwick.com.



Risk and compliance

Identifying risks

Sedgwick evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by monitoring its relationship with its partners and ensuring that appropriate due diligence checks of key suppliers are undertaken.

Sedgwick Australia regularly convenes Board Risk, Audit and Compliance Committee (BRACC) meetings. Our BRACC is made up of a cross-section of executive leadership management representatives, who meet to discuss all matters relating to risk management and compliance including analysing new and emerging risks, and identifying appropriate solutions. The committee's remit includes identifying risk internally and within our supply chain, monitoring potential / emerging risk areas and identifying ways to reduce risks, including those of slavery and human trafficking.

The high risk sectors in Australia as noted in the Global slavery index, Electronics, Fish, Garments, Solar Panels and Textiles are not prevalent in our supply chains and we only work with well-known and proven suppliers who meet our due diligence criteria. Where we identify a potential risk, it is recorded, assessed and remedial action taken.

Assessing risks

Sedgwick Australia also undertakes a modern slavery risk assessment on its top 10 suppliers ('Risk Assessment'). This was most recently undertaken in May 2024, after the reporting period covered by this statement.

Sedgwick Australia's Risk Assessment found that none of our suppliers are providing us with high-risk goods and none of them are from high-risk countries. The top 10 suppliers primarily provide restoration services. Top 10 suppliers to Sedgwick have evidence of compliance with the Act, publishing their own modern slavery statement on their website or they have completed a modern slavery governance questionnaire prior to onboarding.

The Group regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by monitoring its relationship with its partners and ensuring that regular due diligence checks of key suppliers are undertaken.

We ensure all our suppliers adhere to our high standards of social responsibility and ethical dealings. We enforce a strict code of compliance and do not tolerate any form of slavery, human trafficking, or worker exploitation within our supply chains. If we find evidence of a failure to comply with our policies, we will immediately seek to terminate our relationship with the relevant supplier.

Incident management

In line with our commitment to respect human rights, we have processes in place to allow us to identify and where appropriate remediate potential modern slavery incidents. These are underpinned by our Sedgwick Australia Incident, Issue and Breach Management Policy. This Policy provides a framework for our approach to investigation and remediation.

Policies and controls

As part of our commitment to combating slavery and human trafficking we have implemented several policies. These policies have been written by the relevant areas of the business, including legal, colleague resources (Sedgwick HR), and risk and compliance and they are subject to annual review to ensure they remain up to date and relevant.

Recruitment

Our Code of Conduct and Ethics Policy sets out our commitments in certain key areas. These include the creation of a working environment where all employees are treated with dignity and respect.

The policy also sets out our workers' rights. These include Sedgwick awareness of their entitlement regarding minimum terms of engagement, annual leave, and sick leave.

Pre-employment screening ensures that appropriate right to work documents are obtained prior to employment.

Employees

We view ourselves as a responsible corporate citizen and we strive every day to make sure our people embody the diversity that exists in the world and have a fair and inclusive work environment where they feel a sense of belonging. We model this by living our core values of empathy, accountability, inclusion, collaboration and growth.

Employees are expected to abide by the standards set forth in our Code of Conduct and Ethics Policy, Equality, Diversity and Fair Treatment Policy, and / or the applicable Colleague Handbook for their jurisdiction. These policies document our standards regarding how we expect staff to behave. This includes our commitment to ensuring we conduct ourselves in an ethical way, preventing any type of slavery, servitude, human trafficking and forced or compulsory labour. These documents also set out the mechanism by which colleagues can, confidentiality, report any concerns they have to the Group using our Ethics Line.

Whistleblowing

We maintain a Whistleblowing Policy, with an associated independent mechanism for reporting concerns known as the Ethics Line. The policy is available to our staff, and is also available to others working with, or on behalf of, Sedgwick. The policy encourages the reporting of potential violations of the law and/or Sedgwick policies, including malpractice, unethical behavior, matters potentially in the public interest or other misconduct within the organisation. This would include any human rights violations, including those relating to slavery. All reports of alleged wrongdoing are fully investigated, and appropriate remedial action taken.

Our procedures are designed to:

- Establish and assess areas of potential risk in our business and supply chains
- Monitor potential risk areas in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains
- Provide adequate protection for whistleblowers

Supplier due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted various due diligence procedures.

Our internal policies include undertaking regular reviews of our key suppliers. Sedgwick's due diligence questionnaires which are used to structure and record these reviews include specific questions about the supplier's policies and training on modern slavery, and how they work to prevent slavery and human trafficking within their business and their supply chain.

Our service contract with our suppliers requires that they adhere to high standards of social responsibility and ethical dealings.

A requirement of our contracts stipulates that any suppliers with whom we partner commits to trading and operating ethically in their dealings with all parties, including our clients, their customers, other suppliers, stakeholders, and public interest groups.

Inclusive of our supplier agreements are our standards and our expectations of behaviour, including those relating to the engagement of labour, terms and conditions of employment, treatment of those who work on behalf of the supplier, prevention of discrimination, and prevention of child and enforced labour.

In addition, we require agreement that the supplier will adhere to employment legislation prevailing in the countries in which they operate.



Effectiveness

Sedgwick uses key performance indicators (KPIs) to measure our success ensuring that slavery and human trafficking are not taking place in any part of our business or supply chains. These are as follows:

Knowledge and capacity

- We track completion rates for all Sedgwick International employees for induction and annual training modules that include Modern Slavery.
- We issue an annual communication to all staff to raise awareness on how to identify signs of modern slavery and how to report actual, or suspected, instances.

Supply chain reviews and engagement

- We conduct annual due diligence reviews on a percentage of suppliers/vendors deemed high risk, with a view to expanding the scope of this assessment.
- We educate our Supply chain on Modern Slavery and ask them to confirm that they have understood their requirements when partnering with Sedgwick.

Collaboration and stakeholder engagement

- We participate in external stakeholders forums to help us understand how our response compares to peers and identify opportunities for improvement.

Legal and compliance

- We review our Modern Slavery Statement and Program of Work annually, or more frequently as required. These reviews are overseen by the Board Risk Audit Compliance Committee.

Incident management and remediation

- We track the nature and volume of reports through our Incident Management Framework and our Ethics Hotline to help us understand whether the mechanisms are accessible to staff.

Training

Globally, Sedgwick invests in educating our staff to help them recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programs, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy.

Staff are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

As part of Sedgwick's annual training around the world, all employees in countries where a modern slavery statement is mandated by law are required to complete a training module on modern slavery. It provides information on what modern slavery and human trafficking is and sets out Sedgwick's policy in this regard, and how to report any concerns.



Consultation and statement approval

Consultation process

This Statement was circulated to the Sedgwick's Executive Leadership Team and the Board Risk, Audit and Compliance committee for comment and endorsement, prior to being put to the Sedgwick Board of Directors for review and approval.

Statement approval

Sedgwick Australia, as the reporting entity, has prepared this statement on behalf of other Australian entities.

This statement constitutes Sedgwick Australia's Modern Slavery Statement in accordance with section 16 of the Act for the reporting period 1 January 2023 to 31 December 2023.

This statement was approved by the Board of Sedgwick Australia on 20 June 2024.

This Statement is signed by a responsible member of Sedgwick Australia as defined by the Act.

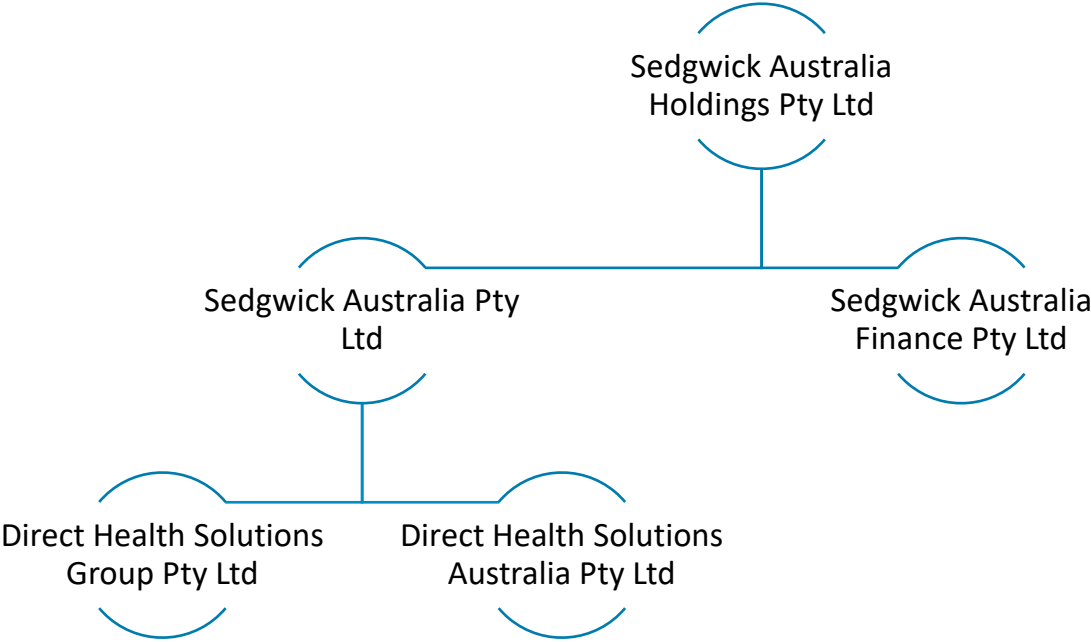


Diego Ascani

Chief Executive Officer Australia and Board Director

Appendix A: Sedgwick corporate structure

This diagram provides a high-level indicative structure of Sedgwick Australia and the list of entities covered by this statement.



Sedgwick Australia Holdings Pty. Ltd.	ACN 162 453 303
Sedgwick Australia Finance Pty. Ltd	ABN 60 006 984 292
Sedgwick Australia Pty. Ltd	ABN 49 003 437 161
Direct Health Solutions Group Pty. Ltd.	ABN 41 646 785 837
Direct Health Solutions Australia Pty. Ltd.	ABN 30 600 165 339