

Cover-More Group Modern Slavery Statement

Introduction

In accordance with the Modern Slavery Act 2018 (Cth), this statement outlines the commitment and steps Cover-More Group Ltd (“CMG”) has taken to identify modern slavery risks and communicate the progress to assess, monitor, manage and reduce the risks within the business operations and in relation to CMG’s supply chain.

Modern slavery is an offence under the Act and violates fundamental human rights via situations of exploitation. The Australian Government defines modern slavery as encompassing “slavery and slavery-like practices, including servitude; child labour; forced or bonded labour; human trafficking; forced marriage, and deceptive recruiting for labour or services”.

Structure of business and reporting entity

CMG consolidate at Zurich Travel Solutions Ltd (“ZTS”), which is an immediate shareholder and incorporated in Australia.

CMG is the reporting entity for its subsidiary entities that conduct the following business activities:

- distribution of insurance services (primarily travel insurance) in numerous jurisdictions globally;
 - additionally, CMG manages (although does not own) entities in Latin America and Canada, and
- a global travel assistance business providing access to emergency medical, security and travel assistance services for individual and corporate travellers.

The provision of these services relies on products and services sourced from third parties, in particular IT related services, various professional services (consulting, data; marketing etc), and facilities management. CMG also relies on third-party distributors as well as a global network of health care providers.

Risk assessment and consultation of subsidiaries

CMG takes a risk-based approach to its annual modern slavery assessment, analysing the CMG’s and its related entities’ exposures to modern slavery risk based on the sectoral composition of its immediate suppliers and the geographic location of its business activities.

CMG has consulted each of its business units to identify and describe supply chains and validate the risk assessment.

On balance, for 2023, the risk of modern slavery in the operations and supply chains of CMG has been assessed as **low**.

Risk may increase when contracting certain services across the following parts of CMG’s global value chain:

- facilities management
- promotional goods
- food and beverage for corporate purposes
- subsidiary services provided to IT equipment manufacturers and
- subsidiary services provided to health care and medical assistance providers.

Scarcity of specialised services, particularly in at-risk geographic locations, may leave CMG with few provider options to provide emergency medical assistance. As a result, CMG may, on occasion, be required to deal with a service provider in a country where modern slavery protections range from minimal to absent in order to

manage and protect the well-being and health of an impacted traveller. Exposure via assistance providers is driven by customer choice in terms of destination and accommodation venues.

Actions to mitigate modern slavery risk

CMG has developed a global Code of Conduct policy documenting the standards of ethical behaviours it expects of its employees. The Code of Conduct reflects a commitment to the protections of international human rights as exemplified in the United Nations Global Compact.

In addition, all CMG entities have in place a whistleblowing policy providing guidance and the forum to speak up and report human rights violations and any form of modern slavery.

These policies apply to all employees of CMG and its subsidiaries and affiliates worldwide to ensure the risk of transactions that contravene human rights and any form of forced labour or modern slavery are reported and mitigated.

All employees are required to complete mandatory Code of Conduct training and assessment upon induction, and annually thereafter, to demonstrate understanding and commitment to ethical behaviour, including the reduction of modern slavery risks.

Final provisions

This document has been approved by the Board of Directors of Zurich Travel Solutions (ABN 47 616 863 604) on 29 June 2023 as the governing body of each entity covered by this statement.

This statement is signed by Cara Morton in their role as a director of Zurich Travel Solutions on 8 September 2023.

