

# MODERN SLAVERY STATEMENT

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### **Modern Slavery Statement**

This Modern Slavery Statement ("Statement") is made pursuant to the *Modern Slavery Act 2018 (Cth)*, by AIA Australia Limited (ABN 79 004 837 861), including AIA Financial Services Pty Limited (ABN 68 008 540 252), CMLA Services Pty Limited (ABN 88 622 557 251), Jacques Martin Pty Limited (ABN 55 006 100 830) and Jacques Martin Administration and Consulting Pty Limited (ABN 24 006 787 748), collectively referred throughout this Statement as "AIA Australia".

This Statement covers the financial year 1 January 2022 to 31 December 2022. This Statement was approved by AIA Australia Limited's Board on 29 June 2023.

AIA Australia has a purpose of making a difference in people's lives. This applies through our life and health insurance products and services, our financial advice business AIA Financial Wellbeing, our wellbeing programs including AIA Vitality, and through our community initiatives and partnerships. All of these are focused on helping Australians live healthier, longer, better lives.

Modern slavery can be present in any industry, including the financial services industry in Australia. The term 'modern slavery' includes circumstances where an individual or group of people are exploited or deprived of freedom by means of coercion, deception or threats.

This Statement outlines AIA Australia's objection to any form of modern slavery, our process for the identification of any risks, and the controls we have in place to address them appropriately.



## About AIA Australia

AIA Australia is a life, health and wellbeing insurance specialist. We offer a range of products that protect the lives and livelihoods of more than 3.7 million Australians. AIA Australia's head office is in Melbourne and we employ over 2,000 staff across Australia. We are part of the AIA Group, which is incorporated and headquartered in Hong Kong, with a presence in 18 markets across the Asia-Pacific region.

AIA Australia's Operating Philosophy is *Doing the Right Thing, in the Right Way, with the Right People, and the Results will come*.

Building a truly healthy culture starts with shared values and common purpose. This also means that our Operating Philosophy starts with our people. We see our commitment to protecting human rights, combatting modern slavery and enabling all people to live and work freely as more than a compliance activity. It is foundational to our commitment to the health and wellbeing of our people, customers and suppliers. We strive to design recruitment and employment practices that not only protect basic human rights and freedoms, but enable overall health and wellbeing.

We take our obligations under the Modern Slavery Act seriously and are committed to protecting human rights and combatting modern slavery across our operations and global supply chains.



## **Risk of modern slavery**

## Risk of modern slavery in AIA Australia's operations

Our operations are primarily Australia-based and predominantly executed in-house, with only small parts of the team supported by partners in offshore locations. Our partnerships with offshore service providers are carefully selected and managed with modern slavery considerations front of mind throughout the engagement and management of these teams.

Our operations include our Financial Wellbeing Advisors, Claims Management, Customer Care, Distribution and Product Design functions, as well as our enablement functions including Enterprise Risk and Compliance, Finance and Actuarial, Legal, People and Culture, and Technology.

With the majority of our team operating in-house and in office or home environments and our employment practices aligned to Australian and International law, the risks of domestic modern slavery including forced labour, servitude, child labour, deceptive recruitment and debt bondage are considered low.

## Risk of modern slavery in AIA Australia's supply chains

We have approximately 850 active suppliers. Our supply chains are primarily Australia based and include suppliers and services related to administration, banking, communication, consulting, investment management, IT, marketing, office supplies, operations, property and facility management, reinsurance and travel.

We also work closely with major Australian financial institutions, corporate partners, financial advisers and affinity partners to deliver and supply its products and services across Australia. We seek to do business with suppliers and business partners that hold similar values and beliefs to those described above.

We understand that there are potential risks of inadvertently contributing to modern slavery directly and indirectly through third-party supply chains. Identifying and assessing those risks in our supply chain is key to mitigating and remediating impacts on modern slavery.



## AIA Australia's approach to managing modern slavery risks

#### Governance

At AIA Australia, we have a robust governance structure that oversees enterprise risks, including the management of modern slavery risk. Our governance structure includes:

- AIA Australia Board
- AIA Australia Board Business Risk and Compliance
  Committee
- AIA Australia Enterprise Risk Management Committee

#### Principles, policies and standards

We have various principles, policies and standards in place to govern conduct, and assess and address risks relating to modern slavery. These include:

- AIA Group Operating Philosophy
- AIA Group ESG Strategy
- AIA Group Code of Conduct
- AIA Group Supplier Code of Conduct
- AIA Australia Whistleblower policy
- AIA Australia Modern Slavery Risk standard

#### Managing modern slavery risk

Our assessment of the modern slavery risk in our operations and our supply chain is low. Our processes to ensure identification and monitoring of the modern slavery risk include, but are not limited to:

- Initial supplier risk assessment and due diligence for new suppliers.
- Annual risk-based due diligence with selected suppliers based on a questionnaire and attestation from the selected suppliers on compliance with the Modern Slavery Act and the AIA Group Code of Conduct. Suppliers are selected in consultation with the Enterprise Risk function based on a risk-based approach.
- Contractual requirement for third-party service providers to comply with relevant laws relating to modern slavery.
- Training on modern slavery risk has been completed by employees in identified roles to increase awareness and to identify risk of modern slavery. We intend to roll out an online learning module to more employees during the year 2023.

We recognise that addressing modern slavery risks is a complex and challenging undertaking. We are committed to

continuous improvement around our actions to comply with relevant laws on modern slavery.

#### Reporting and remediation

We encourage reporting of any misconduct or improper state of affairs. To support this, we continue to leverage our existing Whistleblower policy and process as well as our other channels to report concerns and complaints, with the ability to do so confidentially and anonymously. The Whistleblower policy and process can be used by anyone, including current or former employees, suppliers' employees, contractors or business associates, or relatives or dependents of the above.

We take all reports seriously and manage any suspicion of modern slavery risk while always keeping the protection of the victim as a priority by adopting a victim-based approach.

## Assessing the effectiveness of our actions

At AIA Australia, we are committed to continuously reviewing and improving the effectiveness of our modern slavery framework, and supporting governance and processes. We regularly convene a modern slavery working group comprising representatives from functions across the business, including Procurement, People and Culture, Enterprise Risk and Compliance, to monitor risk of modern slavery in our operations and in our supply chains, and ensure our internal controls are relevant, reliable and effective. The modern slavery working group does so by seeking feedback from our key stakeholders, analysing and challenging our due diligence results, and continuously seeking to improve our controls and expand our training for future reporting periods. We are not aware of any instances of modern slavery in our operations of supply chain in 2022.

#### Process of consultation

AIA Australia's entities operate under a common set of governance policies, standards and processes, managed by enterprise-wide functions such as Procurement, People and Culture, Enterprise Risk and Compliance, and enterprise-wide management committees.

The Boards of AIA Financial Services Pty Limited, CMLA Services Pty Limited, Jacques Martin Pty Limited and Jacques Martin Administration and Consulting Pty Limited have reviewed and approved this Statement.

## **Other relevant information**

In 2022, AIA Group, AIA Australia's parent entity, issued its new transformational, long-term Environmental, Social, and Governance Strategy (ESG Strategy), reflective of its position as a global industry leader. AIA Group is aware of the social and environmental issues that our communities face, and is committed to overcoming them in a sustainable and ethical fashion.

In line with this, we confirm we remain committed to not only act in accordance with the Modern Slavery Act, but to ensure that we are acting ethically and responsibly and in accordance with the highest standards.

5/04

**Peter Yates** Chair of AIA Australia Limited's Board AIA Australia Limited

Kristy Redfern Company Secretary AIA Australia Limited



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