

# Modern Slavery Statement

1 October 2022 to 30 September 2023





# Introduction

Tower is a born and bred Kiwi insurer with a history spanning more than 150 years. We take pride in helping our Kiwi and Pacific customers protect their homes, cars, businesses and things they love. Our purpose is to inspire, shape and protect the future for the good of our customers and communities.

Tower's geographical footprint means we have a unique role to play in the communities we operate in, and being there for those communities when they need us most is fundamental to our operations. We are committed to achieving the highest standards of environmental, social, and ethical behaviour and we have implemented governance practices that are compliant with New Zealand and Pacific regulations.

In staying true to our purpose, Tower does not tolerate modern slavery practices and we reject it in all forms. Our approach towards modern slavery is constantly evolving. We are committed to proactively and regularly updating our modern slavery processes and policies to ensure the risk of exposure to modern slavery remains low.

We have a Code of Conduct Policy to protect and uphold our values, and processes to eliminate modern slavery from our supply chain in our New Zealand and Pacific operations. At Tower we are always on a journey of continuous improvement, and we are extending our Supplier Code of Conduct to our operations in the Pacific this year.

Tower complies with the requirements of the Australian Modern Slavery Act 2018. This Modern Slavery Statement has been prepared pursuant to the Australian Modern Slavery Act 2018, Commonwealth.

This Statement was approved by Tower's Board on 26th March 2024.



**MICHAEL STIASSNY**

Chairman



**BLAIR TURNBULL**

Chairman

## Our purpose

"To inspire, shape and protect the future for the good of our customers and communities."





# About Tower's Statement

Tower Limited's (Tower's) Modern Slavery Statement describes Tower, its operations and supply chain and outlines:

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1

Tower's approach to the identification of risks of Modern Slavery practices occurring within its operations and supply chain

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2

The frameworks in place to assess and address these risks

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3

The assessment of the effectiveness of actions to be taken to address Modern Slavery risk



# Tower Brand and Corporate Structure

For over 150 years Tower has been helping Kiwis and Pacific customers protect their home, car, business, and things they love.

At Tower, we are undertaking a transformation that leads to higher growth through a relentless focus on our customers. We have proven ourselves to be resilient and robust in a difficult time for the New Zealand economy and have an exciting future ahead of us.

We are focused on delivering beautifully simple and rewarding experiences for our customers. To get there we have set out a number of clear strategic priorities aimed at helping us to grow and innovate, as well as to build financial strength and capability as a company.

Tower is headquartered in Auckland, New Zealand and

operates in New Zealand and the Pacific, providing our customers with cover for their houses, cars, contents, businesses and more.

Tower is listed on the NZX as well as being listed on the ASX, with a strong base of international, institutional and individual shareholders.

Tower is licensed to undertake general insurance business in New Zealand under the Insurance (Prudential Supervision) Act 2010 (IPSA). Tower is required to comply with the requirements of IPSA. Tower's compliance is regulated by the Reserve Bank of New Zealand (RBNZ). Tower is also regulated in respect of financial conduct by the Financial Markets

Authority (FMA). Tower issues and promotes general insurance products in New Zealand and the Pacific Islands. Tower's annual Gross Written Premium for the 2023 reporting period was over NZ\$500 million.

Tower directly employs over 800 employees in locations across New Zealand and the Pacific.

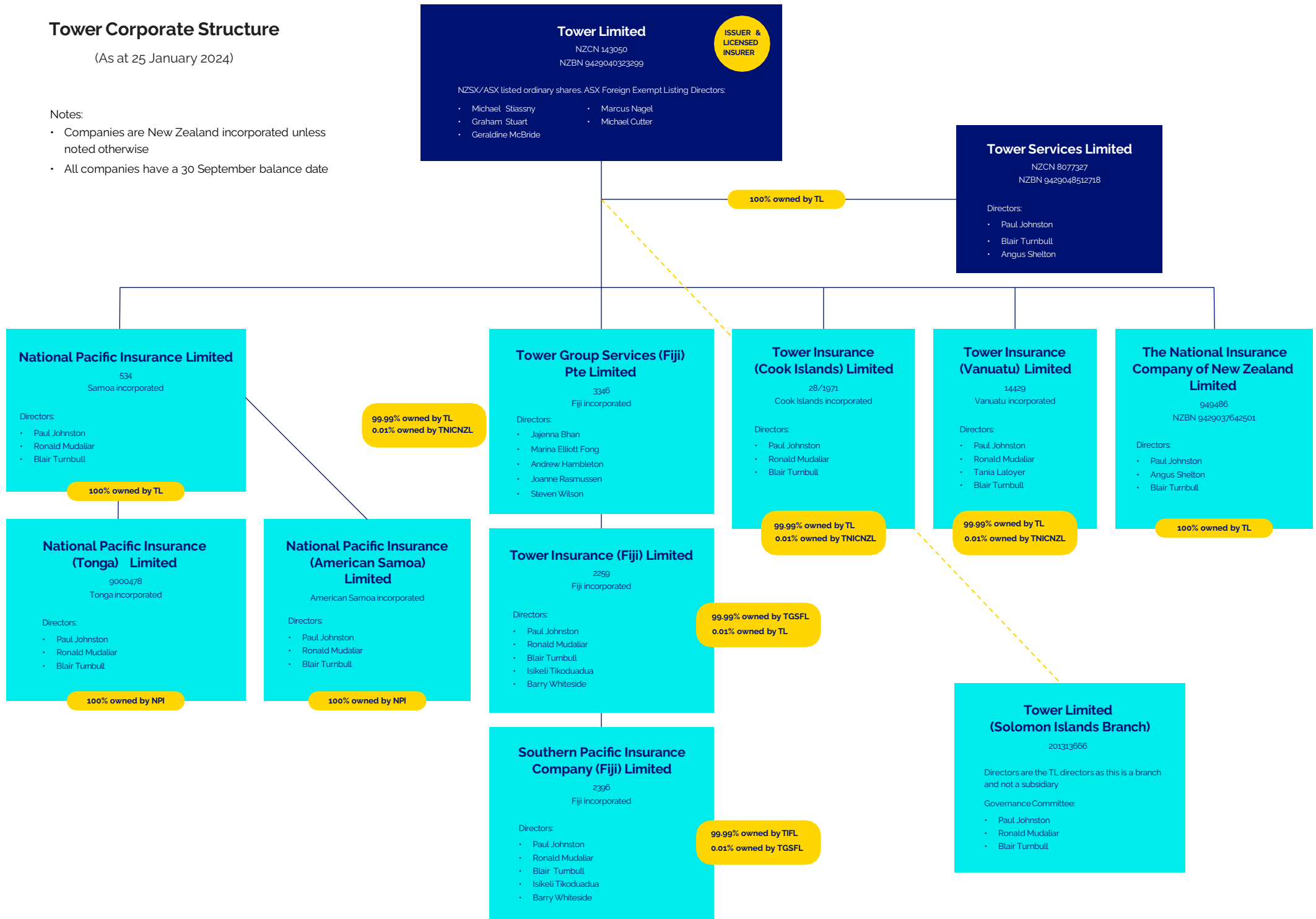
The reporting entities covered by this statement are set out below and include Tower Limited controlled subsidiaries. In 2023, Tower announced the sale of its Solomon Islands business, which was completed in 2024.

# Tower Corporate Structure

(As at 25 January 2024)

## Notes:

- Companies are New Zealand incorporated unless noted otherwise
- All companies have a 30 September balance date





# Tower's Structure, Operations and Supply Chains

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## Corporate Governance

The Tower Board is committed to achieving the highest standards of corporate governance, ethical behavior, and accountability and has implemented corporate governance practices that display these standards. Where developments arise in corporate governance, the Board reviews Tower's practices and incorporates change where appropriate.

Tower complies with the FMA and RBNZ guidelines on corporate governance, in addition to, the NZX Listing Rules and NZX Corporate Governance Code.



## Tower Operations

Tower provides general insurance products to its customer base. The principal activities Tower undertakes to carry on its business include:

- Marketing and sales
- Administration
- Product development and underwriting
- Customer servicing
- Claims management
- Technology platforms and operations
- Shared services such as but not limited to legal, procurement, finance, risk and compliance, people and culture, capital investment management delivered through the transformation office.

Tower has employees in locations across New Zealand and the Pacific. The majority of Tower's workforce is considered to be skilled or highly skilled personnel. Tower complies with its employment obligations, including those relating to the New Zealand Workplace Health and Safety Act 2015, the New Zealand Employment Relations Act 2000 and the New Zealand Human Rights Act 1993.

Tower has a Code of Conduct Policy which has been approved by its Board. The Code of Conduct Policy sets out the minimum standards of conduct and behavior that Tower Limited, and any subsidiary or related



Tower company expects of its directors, executives, employees and contractors (collectively) in all their business dealings. The purpose of the Code of Conduct Policy is to protect and uphold Tower's values by promoting ethical and responsible conduct. In doing this, Tower enhances its reputational integrity, identifies and manages any potential risks, increases investor and customer confidence, and promotes confidence in the New Zealand financial service industry. This Code of Conduct Policy is available on Tower's website.

Key Tower processes that mitigate potential modern slavery risks are:

- Established procurement and supplier policies and frameworks
- The presence of a formalised whistleblowing process
- Activities ensuring employees are safe and their health and wellbeing is taken care of
- Ensuring that employees are aware of their responsibility to behave in a way that is not dishonest, illegal, fraudulent, corrupt, or unethical
- All Tower employees and internal processes are subject to Tower's Risk Appetite Statement and Risk Management Framework.



## Tower Supply Chain

Tower relies on a combination of local and global suppliers to operate its business. To support the management of the supply chain Tower views the supply chain in two very distinct groups namely its corporate supply chain and its claims fulfillment supply chain.

Towers corporate supply chain includes products and services from third parties who fulfill its internal operational needs. This includes a range of sourcing across New Zealand and the Pacific local markets along with global providers.

Key areas of spend in this category include:

- Technology Solutions predominantly purchased as a Software as a Service (SaaS). A number of these are critical to Tower's core functions such as the Enterprise Resource Planning (ERP) system
- Technology platforms such as the core insurance system of record platform
- Managed services providers who provide services such as software and hardware management, support and development
- Cloud services providers that through data center infrastructure and connectivity can host our data and solutions that enable our digital services offerings to our customers along with enhancing automation within our operations both external customer and supplier facing and how we operate across the internal business



- Professional services both on and offshore across the organisation covering a wide range of skills
- Property leases and facilities management supply chain covering services such as office fit outs, cleaners, security, office consumables and utility services across Towers office footprint
- Banking and investment service providers, and Marketing services including media production, design and advertising products and services.

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## Tower has identified the following areas in its supply chain operations which have the potential for Modern Slavery risk:

- Investments
- House claims suppliers (New Zealand and Pacific)
- Motor claims suppliers (New Zealand and Pacific Islands)
- Contents claims suppliers (New Zealand and Pacific Islands)
- Facilities management (Pacific Islands)
- Cash settlements, in lieu of repair, of house and motor claims (New Zealand and Pacific Islands)
- Supplier staffing (Pacific Islands)



### Investments

Tower recognises that we may contribute to modern slavery risk through our bank deposits and investment portfolio, however we assess this risk as low.

Tower's Treasury Policy restricts our investments to high-grade domestic or international government, quasi-government bonds and corporate bonds, as well as bank deposits. In NZ, Tower holds bank deposits with Westpac, and all other investments are managed by an external fund manager, Nikko AM. Nikko AM believes in a responsible approach to investing and is committed to upholding the highest standards of business ethics and conduct. Nikko AM has been a signatory of the UN Principles for Responsible Investment since 2007 and actively addresses the risk of modern slavery issues that may arise in their operations or investments.

In the Pacific, Tower's subsidiaries hold deposits with a range of banks, including subsidiaries of Australian/French banks and local banks.





## House claims suppliers (New Zealand and the Pacific)

Tower supports its customers in limited circumstances in providing end to end management of house insurance claims. As a result, Tower can be involved in procuring property and construction services. Tower may engage construction, assessing and repair industry suppliers, usually through reinstatement companies to assess and complete building projects.

Tower has a select group of suppliers for much of the work required, but there are high volumes of work going to these suppliers.

House claims suppliers are associated with several Modern Slavery risk factors, chief among them being that the property and construction industry is documented as utilising a base-skilled labour force and also that the raw materials utilised in construction may be linked to Modern Slavery practices.



## Motor claims suppliers (New Zealand and the Pacific)

As with house insurance claims management, in managing motor vehicle insurance claims Tower utilises preferred motor vehicle repairs and motor vehicle service providers to replace or repair motor vehicles in New Zealand and the Pacific Islands. Motor vehicle claims Suppliers may be associated with Modern Slavery risk factors, including use of migrant and base-skilled workers who are involved in towing, panel-beating, glass replacement and roadside assistance. Such workers may not be aware of employment laws and may be considered at a higher risk of being subjected to Modern Slavery practices.



## Contents claims suppliers (NZ & Pacific Islands)

Tower procures a wide variety of consumer products for its customers to replace their personal contents when required for a claim.

Commonly procured consumer products such as furniture, IT hardware and electronics are considered to be 'high risk' for links to Modern Slavery. These consumer goods can be made using raw materials that are often sourced and manufactured in high-risk geographies or the use of migrant and base-skilled workers who are involved in the manufacturing or distribution activities of these suppliers.



## Facilities management (New Zealand and the Pacific)

Tower utilises building maintenance and repairs services for its various commercial buildings across New Zealand and the Pacific. Facilities management may be subject to Modern Slavery risk factors such as:

- Building maintenance and repair services are a known high-risk category for Modern Slavery due to the intersection between vulnerable populations in the workforce and the common business model of outsourcing these services and sub-contracting within the industry itself. In respect of the Pacific Islands, such services that are procured in regional and remote locations and by comparison to the New Zealand Tower operations, the risk may be higher.
- In some circumstances, Tower has decentralized procurement decisions relating to facilities management in the Pacific to the country leaders.
- There is notable regional migration within Pacific Island nations. The acceptability of payment of wages in cash may result in Tower not having oversight over workers having their visa conditions or work rights respected within Towers supply chain operations.



## Cash Settlements, in lieu of repair of 'house' and 'motor' claims (New Zealand and the Pacific)

In limited circumstances, Tower may not procure claims services directly on behalf of its customers. Tower may settle a claim through payments directly to the customer, in lieu of repair, allowing the customer to choose a supplier outside of Towers approved supplier network. Tower does not provide claim settlement payments directly to suppliers in these circumstances.

Where Tower makes payments directly to customers the payments could unwittingly contribute to Modern Slavery practices when customers use suppliers of their choosing.



## Supplier Staffing (Pacific Islands)

There is a risk that due to the geographical remoteness of Tower's Pacific Islands, and differences in cultural norms, supplier sourced contingent workforce could be used within Tower's operations for base-skill tasks such as administrative, cleaning and security roles without the usual protections being in place. This could contribute to Modern Slavery risk.

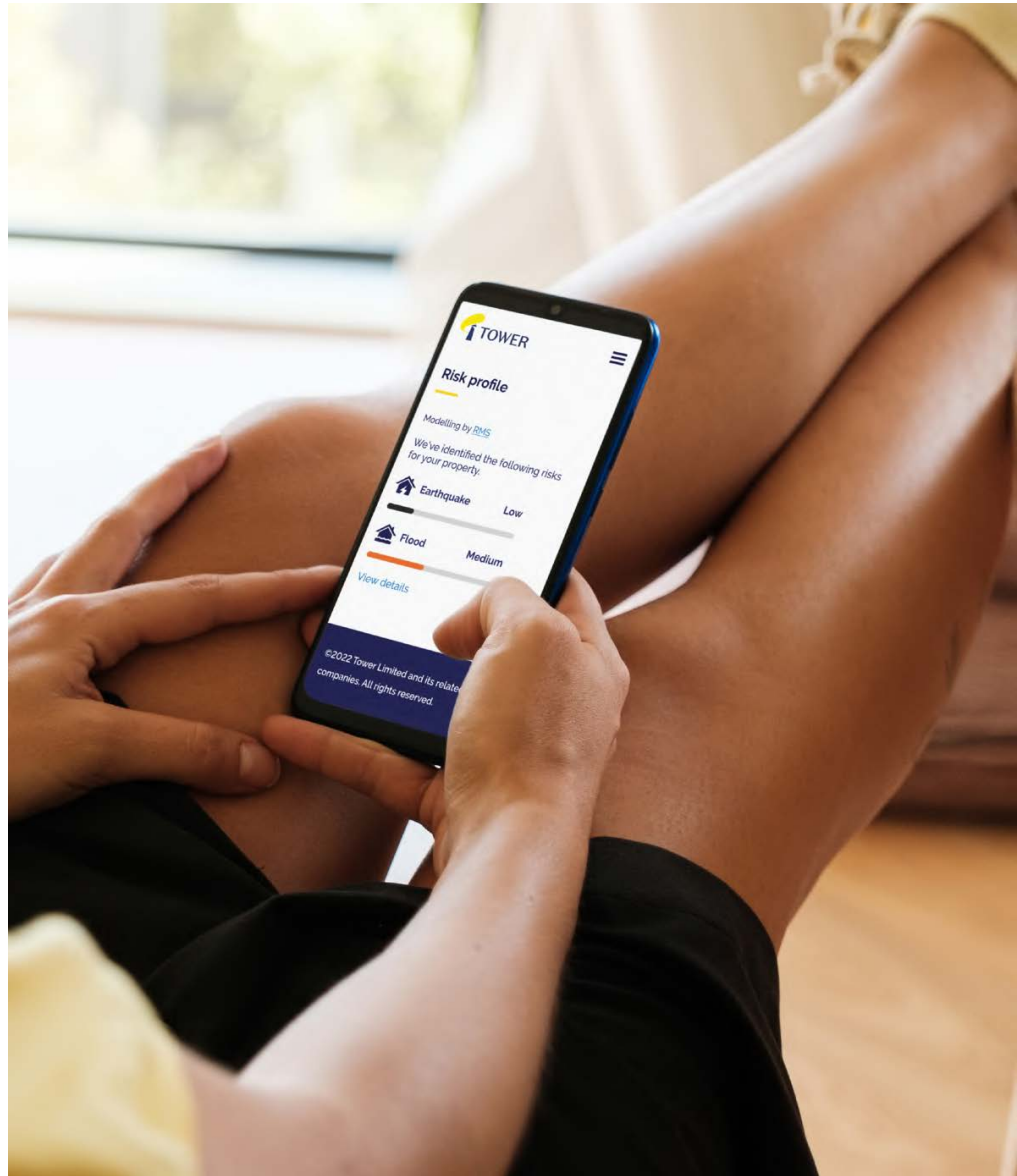


# Managing our Modern Slavery Risk

For Tower to provide its products (being general insurance products) it utilises the products and services of third parties.

This includes products and services sourced in both New Zealand or overseas and extends beyond direct suppliers.

As a purchaser of goods and services we continue to strengthen our approach to sustainable sourcing and supplier risk management within our operations and supply chains.





# Our Supplier and Procurement Policies & Framework





## Tower Procurement and Supplier Relationship and Management framework

Tower has developed Frameworks for New Zealand. A program of work is underway with a due date of 31st December 2023 to extend these policies and frameworks into the Pacific. These Frameworks specifically detail the processes for how Tower engages and manages our third-party suppliers. These framework principles, roles and responsibilities are communicated to internal Tower business units to ensure awareness, understanding and adherence. These frameworks and supporting documents are living documents that govern Tower's overarching expectations of our third-party suppliers.

## Supplier Code of Conduct

A Supplier Code of Conduct has been developed and implemented that outlines Tower's expectation that the suppliers we engage with adhere to international human rights standards and monitor and address these standards within their supply chains.

We recognise that implementing change across our supply chain and through our various third-party suppliers' supply chains will take a multitude of different approaches to ensure the risk is well understood, identified, and mitigated.

We recognise that this is a journey and are continuously looking at ways to improve our methods to deliver to our promise. We have set regular reviews of this Code of Conduct and have included reference to this code in all our

purchase terms and conditions along with the code needing to be reviewed and agreed to within the supplier onboarding process which as of 31 Dec 2023 will include the Pacific countries.

If a supplier does not opt into the code and they don't have their own that is of equivalent standard the Procurement team will raise this with the ELT sponsor with a recommendation not to onboard that supplier. This will be monitored as part of our contract sign off process as a mandatory field to tick which will ensure the focus is embedded within our standard processes. This model is currently being defined and will be rolled out and embedded in FY24.

Tower welcomes working with Suppliers that show a steady progression to compliance and will work with them to achieve this goal – not only for Tower, but all their customers too.

## Third Party Risk Management

Tower third-party risk management processes include extending our due diligence processes to consider Modern Slavery, and how we can identify high risk suppliers. Tower has taken the approach to categorise our third-party suppliers and risk rate them. A more thorough due diligence check is performed on our higher risk rated suppliers using Politically Exposed Person (PEP), Sanctions and adverse media screening.

Tower is working with several external partners to identify an automated platform that we can apply to our entire supply chain. With this technology we

will be able to identify those suppliers most exposed to unethical sourcing practices and Modern Slavery.

## Our Internal Operations and Due Diligence

Tower has introduced Modern Slavery Risk assessments into its New Zealand & Pacific procurement onboarding procedures for its suppliers by embedding the code into our purchase orders. Doing this means that every time Tower places an order with a supplier and they deliver on the purchase orders request they are signing up to the terms, which they receive a copy of as part of the purchase order document.

Tower's Supplier agreements have the relevant legal contractual provisions to ensure adherence to applicable laws and obligations around Tower Limited operations and our supplier code of conduct.

## Our Education and Awareness

Tower has established a dedicated internal online support and awareness page for Modern Slavery to support internal business units with Modern Slavery requirements and processes.

Dedicated online learning resources are available to relevant business units across New Zealand and the Pacific Procurement and People and Culture teams at Tower. Tower will look to roll this awareness training out further across the business along with additional content as part of creating awareness and buy in to eliminating modern day slavery.



# How the effectiveness of our actions is assessed

Tower's position is that ongoing risk and control assessment is maturing around mitigation of Modern Slavery risks.

This ensures continuous improvement is achieved around management of activities and practices that may cause or contribute to, whether directly or indirectly, to Modern Slavery.

Tower's Modern Slavery compliance obligations are documented via our Obligations Management Framework and managed via our internal risk management system. Periodic management attestations ensure awareness and adherence to modern day slavery obligations.

Periodic internal audits and risk and control assurance are conducted across our internal risk and control frameworks as per our risk management framework.

We are committed to continue to build our risk and control maturity in assessing and mitigating potential risks of Modern Slavery within our supply chain operations.



# Glossary of Terms

Board	refers to the Tower Limited Board of Directors.
Code of Conduct Policy	refers to Tower Limited's standards of conduct for employees.
Modern Slavery	means offences that are amongst the most egregious breaches of human rights. Such rights include the right to decent work, the right not to be subjected to slavery, or slavery-like practices, and the protection of vulnerable populations from exploitative business practices.
NZD	means New Zealand Dollars.
Pacific	refers to Tower Limited's Pacific Islands subsidiaries and branch, outlined on page 6.
Reporting period	means 1 October to 30 September
Risk of Modern Slavery/ Modern Slavery Risk	means the potential for a business to cause, contribute to or be directly linked to Modern Slavery through its operations and supply chain.
Services	means services relating to claims investigations, house and motor assessing, house or motor repair or replacement work.
Statement	means this Tower Limited Modern Slavery Statement.
Supplier	means the external provider of a goods or services to Tower Limited.
Tower	means Tower Limited.