

# AUB Group Limited Modern Slavery Statement

For the reporting period 1 July 2019 to 20 June 2020



## 1. AUB Group's structure, operations and supply chains

AUB Group Limited (ACN 000 000 715) is a publicly listed company incorporated in Australia.

Its registered office is:

Level 14, 141 Walker Street

North Sydney NSW 2060

AUB Group comprises of 90 controlled and non-controlled entities in its network (**Network**) of insurance intermediary and related entities. This Modern Slavery Statement is only in respect of AUB Group Limited and its controlled entities, except where stated otherwise in this document.

This Network:

- has over 3,000 employees across Australia and New Zealand focused on enabling relevant risk advice and solutions for clients; and
- services more than 1.4 million client policies across 450 locations, representing in excess of \$3.4 billion of Gross Written Premium (GWP), a key industry measure for the total premium revenue placed with insurers.

During the reporting period, the global supply chain of AUB Group Limited and the companies in its Network comprised approximately 8,500 direct suppliers from a total of 26 countries, including Australia, New Zealand, United States of America, United Kingdom, Germany, Japan, Singapore, Netherlands, France, Ireland, Philippines, China, Canada, India, Fiji, Greece, Italy, Israel, Jersey, Malaysia, South Korea, Sri Lanka, Switzerland, Taiwan, Cambodia and Thailand.

The supply chains include suppliers of goods and services that contribute to general operations, including insurers, lawyers, accountants, travel agents, transportation providers, accommodation providers, professional bodies, facilities maintenance, catering, property management, telephony, internet services, IT equipment, software vendors, external consultants, business services, office supplies and stationery businesses, general building repair and maintenance providers, manufacturers of uniforms or apparel, advertisers, marketers, security service providers, caterers and entertainment providers.

## 2. Risks of modern slavery practices

AUB Group Limited and its Network operate entirely in the highly regulated jurisdictions of Australia and New Zealand which feature labour and award safeguards for employees.



AUB Group Limited has conducted a preliminary review of the supply chain for AUB Group Limited (the entity) and its controlled entities (i.e., a subset of the overall Network, excluding non-controlled entities). We considered the outcome of that preliminary review against modern slavery data and resources published by government, non-government, and international organisations such as Department of Home Affairs, International Labour Organisation, the Walk Free foundation and the 2019 OECD Annual Report for Multinational Enterprises.

The outcome of the preliminary review suggests the following modern slavery risk areas are potentially relevant to the operations of AUB Group Limited and its controlled entities:

- products and services that involve lower wages and manual labour, such as suppliers of cleaning, catering, transportation providers, IT equipment, back office functions such as accounting and administrative support, customer service & call centres, and manufacturers of uniforms or apparel;
- suppliers based in countries that have not ratified international conventions or otherwise adopted modern slavery regulations, or where there is a weak rule of law; and
- sectors and industries that do not have high a degree of regulation and/or monitoring, including the consumer sectors such as food producers, retailers, apparel, and consumer electronics firms.

### 3. Actions to assess and address risks

AUB Group Limited will ensure that for itself and its controlled entities it takes the appropriate steps towards modern slavery compliance.

With respect to non-controlled entities, AUB Group Limited cannot control the actions of those entities but will, as far as possible, educate, encourage and provide resources to assist compliance by those entities.

For the reporting period, AUB Group Limited has initiated numerous modern slavery compliance measures to both assess and address identified and potential risks. Those are outlined below.

#### Modern slavery compliance

AUB Group Limited has drafted a Modern Slavery Compliance Programme to complement its Modern Slavery Policy and existing Risk Management Framework. Modern slavery obligations will be managed under the existing AUB Group Risk Management Framework. AUB Group expects to finalise the Modern Slavery Compliance Programme over the course of the following reporting period. Development of measures are well underway (refer below).

#### Supply chain assessment

As a first step towards assessing the risks within AUB Group Limited and its controlled entities' supply chains, AUB Group Limited obtained this supply chain information in respect of each supplier:

- 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 was cross-referenced against modern slavery data and resources published by government, non-government and international organisations to highlight potential modern slavery risks that warrant further assessment. We are in the process of assessing that information.

#### Other compliance measures

AUB Group is evaluating further potential measures to assess and address modern slavery risks as follows:

- Supplier assessments and questionnaires;
- Supply chain mapping framework;
- Complaints handling regime;
- Internal training framework; and
- Template supplier contract provisions.

## 4. Effectiveness of actions to assess and address risks

AUB Group Limited's actions to identify and address risks to date have been assessed for efficacy. Those assessments have confirmed efficacy commensurate with measures that have only recently been commissioned and which are still in the stages of further development.

AUB Group Limited recognises the importance of regularly assessing the effectiveness of its actions. To that end, AUB Group Limited is committed to documenting and analysing all identified breaches of proposed modern slavery regulations, including their relevance to the current efficacy of AUB Group Limited's measures.

## 5. Consultation process

AUB Group Limited has commenced consultations with its controlled entities through meetings held in an open manner. Consultations during the reporting period allowed for discussions about reporting requirements and actions to map supply chains.



The consultations featured, amongst other things:

- completion of AUB Group member questionnaires for analysis by AUB Group Risk & Compliance;
- discussions between respective risk officers and senior managers;
- preliminary work to develop consistent modern slavery clauses for use in contractual arrangements with suppliers and partners across the AUB Group network;
- potential training modules; and
- supplier data sharing.

AUB Group Limited's Modern Slavery Compliance Programme will expand these consultations and refine them over time.

## 6. Board approval

This Modern Slavery Statement has been approved by the Board of AUB Group Limited.

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

David Clarke

Chair of AUB Group Limited Board

24 March 2021