



**Hollard  
Modern Slavery  
Statement  
2023**

**Hollard.**

# CONTENTS

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<b>Message from the CEO</b>	<b>3</b>
<b>Statement Overview</b>	<b>4</b>
<b>Introduction</b>	<b>4</b>
<b>Approval of Statement by Joint Reporting Entities</b>	<b>4</b>
<b>PART A: Hollard Business and Consultation Process</b>	<b>5</b>
About the Hollard Group	5
Consultation Process	5
<b>PART B: Operations and Supply Chain</b>	<b>6</b>
Operations	6
Operations Mapping	8
Due Diligence of Targeted Suppliers in Reporting Period	13
<b>PART C: Actions Taken and Future Focus</b>	<b>15</b>
Governance of Group Policies and Modern Slavery Risk	15
Training and Awareness	15
Grievance and Remediation Processes	16
Summary of Action Taken and Assessing Effectiveness	17
Future Actions	18



# Message from the CEO

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Hollard is a large insurer primarily underwriting in Australia and New Zealand.

Hollard recognises that we have an important role in protecting against Modern Slavery. We are a purpose-led organisation with a focus on delivering insurance that goes further, together for our people, partners, customers and community.

This is Hollard's third Modern Slavery Statement and we continue to build our understanding and approach to assessing modern slavery risks across our insurance operations, investments and supply chains. In FY23, Hollard was part of the Insurance Council of Australia (ICA) Insurance Industry Modern Slavery Working Group. We look forward to continuing this work with our industry peers in the future.

Hollard strives to maintain responsible supply chains with partners whose conduct and values align with Hollard.

Hollard strives to respect human rights and acknowledges that modern slavery can occur in every industry and that core business activities may impact human rights. A culture of integrity is our aim and synonymous with our values as a Positive Business that seeks to do well by doing good.

Hollard's governance frameworks support the embedment of ethics across our operations and reinforces our commitment to meeting customer and community expectations.

*Paul Fahey*

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Paul Fahey  
Group CEO



## STATEMENT OVERVIEW

This Modern Slavery Statement (**this Statement**) is made on behalf of Hollard Holdings Australia Pty Ltd (ACN 154 586 802) (**HHA**), Hollard Insurance Partners Limited (**HIP**) (ACN 067 524 216) and The Hollard Insurance Company Pty Ltd (ACN 090 584 473) (**HIC**) (together collectively referred to as **we** or **Hollard** in this Statement), as joint reporting entities, pursuant to the Modern Slavery Act 2018 (Cth) (**the Act**).

Other than these three entities, no other Hollard controlled entities meet the reporting entity criteria under the Act.

All information and actions reported in this Statement are relevant to the FY23 Reporting Period 1 July 2022 to 30 June 2023 (**Reporting Period**).

# INTRODUCTION

## STATEMENT CONTENT

This Statement has been prepared in accordance with the mandatory criteria outlined in the Act, and is set out in 3 Parts:

### PART A

## Hollard Business and Consultation

- Summary of the structure, operations and supply chains of Hollard;
- Process of consultation with entities in Hollard's control to assess and address risks of modern slavery; and
- Details of approval by the relevant principal governing bodies of HHA, HIP and HIC.

### PART B

## Operations and Supply Chain

- Summary of risks of modern slavery practices in the operations and supply chain of Hollard; and entities in its control.

### PART C

## Actions taken and Future Focus

- Actions taken by Hollard and entities in its control to assess and address risks of modern slavery;
- The way in which Hollard assesses the effectiveness of such actions; and
- Our future focus.

## APPROVAL OF STATEMENT BY JOINT REPORTING ENTITIES

HHA is a non-operating holding company and shares the same board as HIC and HIP (**Hollard Boards**). The approval of this joint statement by the board applies to HHA, HIP and HIC.

## PART A

# Hollard Business and Consultation Process



### ABOUT THE HOLLARD GROUP

HHA is a non-operating holding company.

HIC underwrites business in Australia and via its branch operations in New Zealand. HIC and HIP are licensed insurers and Hollard is regulated in Australia by APRA<sup>1</sup> and in New Zealand by RBNZ<sup>2</sup>. All insurance underwriting activities of the Hollard group are conducted by HIC and HIP.

HIP became a wholly owned subsidiary of HHA effective 30 September 2022 and accordingly activities reported in this Statement as they pertain to HIP commenced as at this date.

Even though HHA is a non-operating company, to the extent required, it uses the same systems, policies and procedures as HIC and HIP (with the exception of certain HIP specific IT systems). Accordingly, in this Statement, a single consolidated description is provided of the joint actions taken by Hollard to address modern slavery risks.

HIC is also the parent company of the following subsidiaries which are controlled entities as defined under the Act:

- Hollard Commercial Insurance Pty Ltd (ACN 603 039 023) (**HCI**); and
- Hollard Australia Services South Africa (Pty) Company No. 2021/894064/07 (**HASSA**).

(Together, **Subsidiaries**).

There were three additional controlled entities in the Reporting Period. Hollard Distribution Services Pty Ltd, a non-operating company which does not have any employees; to the extent required, it uses the same systems, policies and procedures as Hollard. Holiday Rescue Limited, an insurance intermediary in New Zealand, which is a controlled entity of Hollard, and Firma Insurance Services Pty Ltd

have not been trading during the Reporting Period.

Hollard and its Subsidiaries employed >1600 people across Australia, New Zealand and South Africa in FY23.

### CONSULTATION PROCESS

To prepare this statement, Hollard has taken a risk-based approach in its review of its operations and supply chain to identify any modern slavery risks.

Embedding human rights protections is a shared responsibility and Hollard and its Subsidiaries engaged throughout the Reporting Period in a transparent and collaborative manner to raise awareness of modern slavery risks and undertake actions to assess risks of modern slavery practices which contributed to the development of this statement.

The consultation process with controlled entities during the Reporting Period included:

- Members of management and employees from all Reporting Entities and Subsidiaries collaborated in the drafting of this Statement;
- Provision of updates and discussions with management and board members as to modern slavery legislative developments including with regards to the statutory review of the Act;
- Discussions regarding the progress of questionnaires and risk-based assessments of modern slavery risks within Hollard;
- Review and further revision of vendor due diligence questionnaires for supplier onboarding;
- Continued inclusion of modern slavery clauses in various contractual arrangements with suppliers and partners; and
- Continued implementation of training modules for Hollard employees to raise awareness of Modern Slavery.

<sup>1</sup> Australian Prudential Regulatory Authority (APRA).

<sup>2</sup> Reserve Bank of New Zealand (RBNZ).

# PART B

## Operations and Supply Chain

### OPERATIONS

#### PROVISION AND DEVELOPMENT OF GENERAL INSURANCE PRODUCTS

Hollard and Hci offer general insurance products to individual and small to medium business customers across Australia and New Zealand through both direct and intermediated channels.

Hollard underwrites a broad range of general insurance products including motor, home, pet, bicycle, and business insurance. Hollard underwrote approximately \$2.8b of premium in FY23.



Car



Home



Contents



Bicycle



Pet



Business

#### INSURANCE SOLUTIONS

Hollard’s key business divisions have operations relevant to the production and distribution of general insurance products through three main distribution channels: direct to market, via selected insurance agencies and via insurance brokers.

General insurance products are also underwritten and white-labelled via corporate partners in Australia and New Zealand. PetSure continues to provide services as an insurance intermediary of HIC.

**Direct**

Direct distribution through brand networks.

**Broker**

Distribution via both independent brokers and large buying groups.

**Agencies**

Specialist provider of business insurance and home and motor personal lines within Australian and New Zealand market, distributed through strategic partners and specialist agencies.

Hollard’s operational activities can be separated into insurance services (claims, operations, distribution, marketing services) and group services. The group services include IT, finance, legal and HR services which support Hollard’s key business divisions. Certain IT development services and support services are provided by HASSA.

Insurance products are developed in Australia for retail and commercial customers in Australia and New Zealand. The residual risk of modern slavery in Hollard financial services business operations is assessed as low because of geographic location of services, regulatory oversight in Australia and New Zealand, policy frameworks and business policies and the application and enforcement of those frameworks and policies.

# HOLLARD OPERATIONS



\* Hollard and Subsidiaries employees

# OPERATIONS MAPPING

## SUBSIDIARY OPERATIONS

### Hollard Commercial Insurance (HCi)

With respect to the Subsidiaries, HCi distributes business insurance products via insurance intermediaries on various insurance technology platforms. HCi performs underwriting and administration services including claims services as an agent for Hollard and has operational activities to support such services in Australia.

### HASSA

HASSA is a subsidiary of Hollard located in South Africa. Operations performed in HASSA include IT development and support services. HASSA employees must adhere to relevant Hollard policies and frameworks which include compliance with applicable law.

Hollard South Africa, a registered insurance company in South Africa headquartered in Johannesburg, provides HR and facilities services to HASSA.

Using the 2023 Global Slavery Index (GSI)<sup>3</sup> data, South Africa has a modern slavery total vulnerability score of 52% which denotes the country as a higher risk geography. HASSA operations are nonetheless deemed low risk given the oversight of HASSA's operations and the nature of the professional services being performed. Hollard continues to work with HASSA to map its supply chain.

## INVESTMENTS

Hollard's operations include making financial investment in and engagement with entities in underwriting, insurance and technology businesses which are strategically aligned with its principal activities.

Strategic investments are overseen by the Hollard Management Investment Committee in accordance with the Group Strategic Investment Framework and, ultimately, by the Hollard Boards. The Group Strategic Investment Framework

includes Modern Slavery due diligence activities with respect to strategic investments.

Hollard's treasury function oversees cash investments with various Australian authorised deposit taking institutions and overseeing the fixed interest investment portfolio per our investment mandate guidelines. Hollard's fixed interest portfolio is managed by Pental Group, which is a reporting entity under the Act, who are specialist fixed income managers. Oversight of treasury is ultimately governed by the Hollard Boards.

Hollard will be developing a Responsible Investments Policy as part of its ESG/ Sustainability Roadmap.

## PEOPLE OPERATIONS

Hollard and its Subsidiaries employed over 1600 people across Australia, New Zealand and South Africa in the Reporting Period.

Employees in Hollard and HCi are employed in Australia, which is a low-risk geographic area in accordance with the GSI due to strong employment and workplace legislation<sup>4</sup>.

Based on the Act Guidance<sup>5</sup> an organisation's employment practices have the potential to cause modern slavery. Employees of Hollard are directly employed by Hollard or its Subsidiaries. Hollard performs human resource functions for HCi and HIP. Hollard South Africa performs recruitment services on behalf of Hollard for HASSA in accordance with local law.

Hollard and its Subsidiaries have dedicated human resource teams performing operational activities including recruitment, salary payments, performance management, development of human resource policies and procedures, and training. Hollard's employment contracts comply with relevant employment laws in each jurisdiction and salaries are regularly reviewed and benchmarked in accordance with the Hollard Remuneration Policy, which is overseen by the Board Remuneration Committee.

<sup>3</sup> Global Slavery Index 2023 Dataset, Walk Free Foundation, available from: [www.globalslaveryindex.org](http://www.globalslaveryindex.org).

<sup>4</sup> Including Fair Work Act 2009 (Cth)

<sup>5</sup> Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities

There are processes in place within Hollard and its Subsidiaries to reduce modern slavery risks in human resource operations including:

- External recruitment services may be engaged by Hollard and its Subsidiaries, however onboarding of employees is performed internally by Hollard;
- During recruitment onboarding checks are conducted to assess an employee's age (mitigating risk of child labour);
- Pre-employment visa checks to confirm work eligibility; and
- Whistleblower policy training for employees to use to confidentially report concerns of unethical or illegal behaviour.

Employees of Hollard and its Subsidiaries undertake training with regards to work, health and safety during onboarding and periodically during the course of their employment. WHS incident reporting was provided to the Hollard Boards and Subsidiaries during the Reporting Period.

Hollard's human resource operations were assessed as low residual risk with respect to modern slavery practices.

### Employee Wellbeing

Hollard and its Subsidiaries' employees and their immediate family members have access to various Employment Assistance Programs (**EAP**). These programs include access to services such as independent counselling/psychologist, legal advice and financial counsellors available on an anonymous and confidential basis. EAP services allow employees to seek assistance for their health, social and financial wellbeing.

HASSA employees have access to medical aid and other employee entitlements in accordance with local labour laws. HASSA employees also have access to several wellbeing services facilitated by Hollard South Africa.

Hollard addresses protection of labour standards and human rights via its Work Health and Safety policies and governance frameworks in adherence to applicable Australian and South African workplace laws which reduces the risk of modern slavery practices.

### OPERATIONS RISK ASSESSMENT OUTCOMES

To support the insurance business operations Hollard and its Subsidiaries have responsibility for all aspects of claims management, underwriting operations and insurance services including claims and non-claims procurement.

Hollard used the GSI<sup>6</sup> as part of its risk assessment with respect to business operations. This risk assessment included a consideration of the services utilised by each business division to help identify the countries, industry sectors and services/goods with the highest risks of modern slavery. After geographic and industry category risks are assessed, Hollard payment volumes are also considered for operations as part of the overall risk rating.

As part of its high-level risk assessment a number of reputable third-party resources were considered including the GSI, Responsible Sourcing Tool<sup>7</sup> and suppliers' response to modern slavery questionnaires (see Supply Chain Mapping Section) and desktop due diligence.

Hollard acknowledges that its operations and actions may have a direct or indirect impact on the risks of modern slavery practices in our supply chains. Hollard has implemented a risk-based assessment process to identify and address any potential risks of modern slavery within our supply chain.

Our assessment process is based on the following Modern Slavery Risk Indicators:

- **Sector and Industry Risks:** Certain sectors and industries may have high modern slavery risks due to their characteristics, products and processes.

6 Global Slavery Index 2018 Dataset, List of Goods Produced by Child or Forced Labour, US Department of Labour, 2022 and Business and Human Rights Resource Centre.

7 United States State Department's Office to Monitor and Combat Trafficking in Persons, Verité, Made in a Free World, and the Aspen Institute, 2020. Responsible Sourcing Tool at: [www.responsiblesourcingtool.org](http://www.responsiblesourcingtool.org)

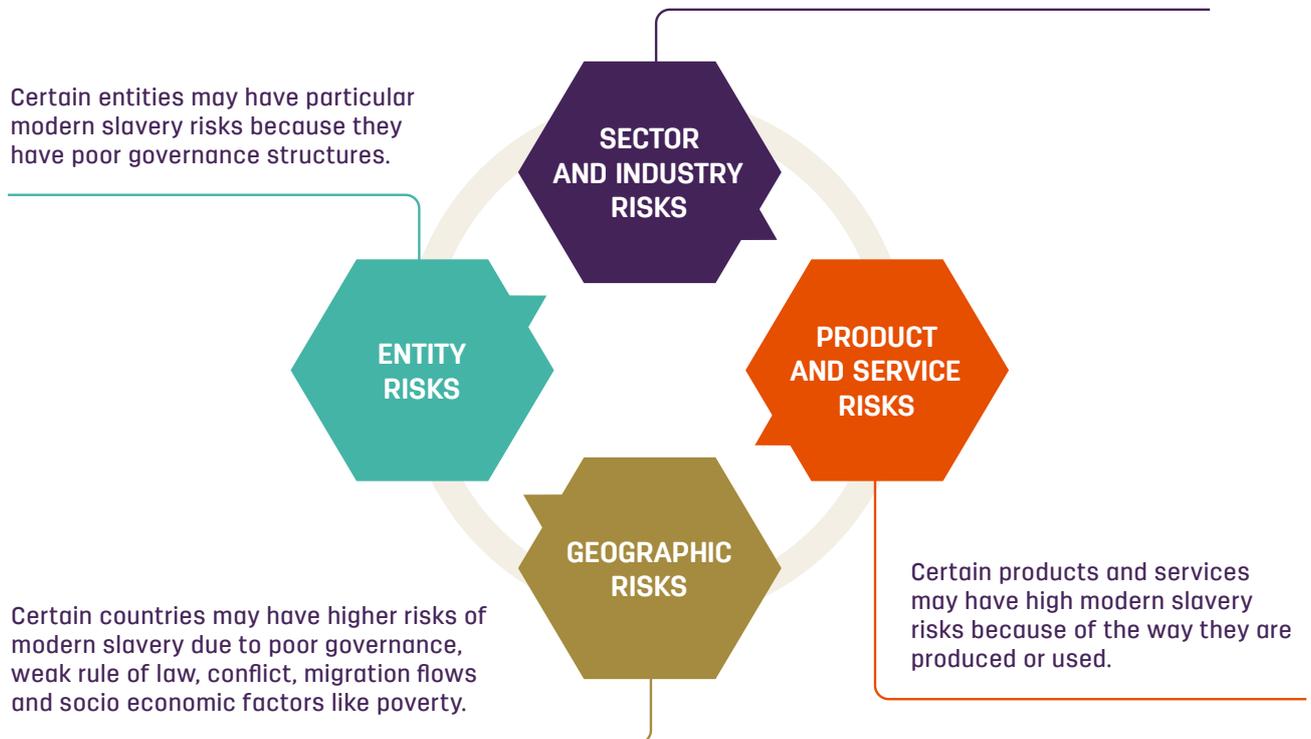
- **Product and Service Risks:** Certain products and services may have high modern slavery risks because of the way they are produced or used.
- **Geographic Risks:** Certain countries may have higher risks of modern slavery due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty.
- **Entity Risks:** Certain entities may have particular modern slavery risks because they have poor governance structures.

The assessments are then graded along a matrix using a residual Low / Medium / High ranking. The rankings determine the due diligence and compliance activities that are to be conducted by Hollard.

Hollard focuses on contracted Tier 1 suppliers with whom it has significant spend and combine country and industry-specific risks to concentrate due diligence and supplier monitoring efforts on suppliers operating in high-risk sectors for modern slavery practices.

### Modern Slavery Risk Indicators<sup>8</sup>

Certain sectors and industries may have high modern slavery risks due to their characteristics, products and processes.



<sup>8</sup> Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities

## SUPPLY CHAIN OVERVIEW

Hollard's supply chain supports its business operations and includes products and services which contribute to the development and supply of its insurance products to customers and corporate functions.

Hollard and its Subsidiaries identified over 3,000 Tier 1 Suppliers in the Reporting Period.

Hollard's supply chain includes corporate service providers, financial service providers and claims service providers. Claims service providers fulfil customers claims and may be appointed by either Hollard or our customers in certain circumstances. Corporate service providers include: IT software and equipment, travel, accommodation, office consumables and

professional services such as consulting, legal and finance. Financial service providers include distribution partners, brokers, and insurance intermediaries. These suppliers were considered low risk. Many of these suppliers are larger entities or organisations subject to modern slavery reporting obligations themselves and operate in Australia.

Insurance and reinsurance suppliers providing corporate insurance to Hollard and its Subsidiaries and government organisations were also considered low risk. This consideration was based on the public commitment to human rights expressed in these suppliers' codes of conduct, their own published modern slavery statements and as they are subject to strict regulatory requirements.

### Hollard Supply Chain Tiers



The following categories of products and services were identified as potentially having higher risk of modern slavery in the Hollard supply chain. The risks were assessed by having regard

to modern slavery risk indicators and publicly available modern slavery risk indexes such as the GSI and US Department of Labor<sup>9</sup>.

### Higher risk categories of products and services



Claims service provider – retail goods, motor and property repair materials and labour used in claims consumables (building materials)



Catering services



Office services – Cleaning and security (domestic and overseas)



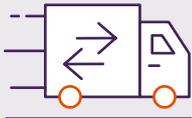
Office consumables – kitchen consumables (coffee, tea), paper, stationery



IT consumables, software, equipment, infrastructure



Manufacturing – promotional product providers



Transport

### SUPPLY CHAIN REPORT PERIOD FOCUS

Hollard has continued to map suppliers directly engaged by Hollard and its Subsidiaries which contribute products and services to business operations in the Reporting Period.

In this Reporting Period, due diligence of the supply chain focused on Tier 1 Suppliers of

Hollard and its Subsidiaries based on a volume/spend threshold and geographic risk. Specifically, suppliers were subject to targeted due diligence if Hollard spend in FY23 was over \$250,000 or where spend was greater than \$10,000 and the supplier was assessed as inherently having a higher modern slavery risk based on modern slavery risk indicators.

### Targeted Tier 1 Suppliers in FY23



**TIER 1**

- Suppliers with costs of goods/service >\$250,000; and
- Suppliers with High Risks of Modern Slavery Indicators with cost of goods/services >\$10,000

<sup>9</sup> Walk Free Foundation, Global Slavery Index 2023 Dataset, List of Goods Produced by Child or Forced Labour, US Department of Labour, 2022.

# DUE DILIGENCE OF TARGETED SUPPLIERS IN REPORTING PERIOD

## DUE DILIGENCE OVERVIEW

Hollard and its Subsidiaries undertook due diligence with respect to Targeted Tier 1 Suppliers depending on the outcome of the initial high-level risk assessment described above:

- **Desktop Due Diligence** which included a desktop assessment of spend, modern slavery indicators, an entity search on Business and Human Rights Resource Centre, and review of published modern slavery regulatory statements in the UK and Australia; and
- **Advanced Due Diligence** which, in addition to the Desktop Due Diligence above, included issuance of due diligence questionnaires to suppliers. This questionnaire sought information from suppliers on their modern slavery policy, governance, employment practices, nature and geographic source of goods and services, and modern slavery risks (if any) identified in their organisation and remediation processes.

Hollard categorised Targeted Tier 1 Suppliers into low, medium or high categories based on the due diligence and risk assessment undertaken. This was to determine what, if any, actions were required to be undertaken by Hollard.

In the Reporting Period, specific focus was placed on continuing due diligence on suppliers that had not previously responded to due diligence questionnaires. In addition to engagement with these suppliers, Hollard also focused on a Desktop Due Diligence for 192 contracted Tier 1 Suppliers onboarded as part of the acquisition of HIP.

When assessing these risks for offshore controlled entities Hollard has had regard to reputable tools such as the GSI and Responsible Sourcing Tool<sup>10</sup> to consider modern slavery risks.

## BUILDING PANEL SUPPLIERS

During the Reporting Period, Hollard reviewed and revised its building and construction service provider panel. Hollard acknowledges that the Australian constructions sector which fulfils customer claims services for Hollard, faces an elevated risk of modern slavery.<sup>11</sup> This is due to the nature of sector labour force and materials sourced from lower-tier suppliers operating in high-risk geographies.

When assessing the risks in this sector we had regard to tools including the GSI and Responsible Sourcing Tool which identified the following construction sector risk factors globally:

- Hazardous/undesirable work;
- Vulnerable, easily replaced, and/or low-skilled workforce;
- Migrant workforce; and
- Presence of labour contractors, recruiters, agents or other middlemen in labour supply chain<sup>12</sup>.

All building and construction service providers completed Modern Slavery due diligence questionnaires as part of Hollard's panel review. Service providers also agreed to Modern Slavery contractual requirements embedding compliance obligations regarding modern slavery in Hollard's supply chain.

<sup>10</sup> United States State Department's Office to Monitor and Combat Trafficking in Persons, Verité, Made in a Free World, and the Aspen Institute, 2020. Responsible Sourcing Tool at: [www.responsiblesourcingtool.org](http://www.responsiblesourcingtool.org)

<sup>11</sup> KPMG Australia and the Australian Human Rights Commission 'Property, construction & modern slavery' 2020

<sup>12</sup> United States State Department's Office to Monitor and Combat Trafficking in Persons, Verité, Made in a Free World, and the Aspen Institute, 2020. Responsible Sourcing Tool at: [www.responsiblesourcingtool.org](http://www.responsiblesourcingtool.org)

## FAST FACTS

### Due Diligence



**255** Targeted Tier 1 Suppliers of both Hollard & Subsidiaries were issued an advanced due diligence questionnaire.

72% of Hollard's Targeted Tier 1 Suppliers completed advanced due diligence questionnaires. Hollard will continue to engage with suppliers who have not responded to questionnaires issued to date during the next reporting period to raise awareness and seek their response. Going forward, Hollard will consider whether it is willing to continue relationships with suppliers that do not engage with our supplier questionnaire.



**250** Targeted Tier 1 Suppliers assessed via Desktop Due Diligence (this included 192 claims service suppliers of HIP).

### Origin of goods and Services

In the Reporting Period, 93% of Targeted Tier 1 Suppliers were operated within Australia with the remaining 7% of Targeted Tier 1 Suppliers located internationally (mainly providing technology and professional services).



## PART C

# Actions Taken and Future Focus

## GOVERNANCE OF GROUP POLICIES AND MODERN SLAVERY RISK

Governance and compliance frameworks apply across Hollard. Each Subsidiary may elect to adopt Hollard's policies or their own (that are at least equivalent to Hollard's policies subject to their jurisdiction) which is reported to the Hollard Boards in accordance with the Group Delegations of Authority Policy.

Governance risks, including employee relations, Whistleblower, data security and Environmental, Social and Governance (ESG) risks (including modern slavery risks) are considered and controlled by various policies and related frameworks.

The Hollard Modern Slavery Compliance Framework establishes a key stakeholder working group comprised of members of senior leaders from the Governance, Procurement, Legal, Finance and HR teams which regularly engaged during the Reporting Period regarding the requirements of the Act and who reported to the Executive Leadership Team via management and the directors via the Board Risk Committee.

Hollard promotes risk awareness and risk management frameworks which are adopted by its Subsidiaries and align with regulatory requirements for the insurance industry. Contracts with Subsidiaries include requirements with regards to risk assessment and notification of modern slavery risks.

Hollard group policies and frameworks are periodically reviewed. This review includes the consideration of modern slavery risks. In the Reporting Period, Hollard undertook a review of policies and frameworks including:

- Hollard Procurement Process was enhanced via the development of a modern slavery risk dashboard for supplier onboarding processes. This was based on modern slavery risk indicators.

- Whistleblower Policy and 'Is This Fair' initiative that provides all employees with a mechanism to confidentially report any concerns they have about risks of modern slavery.
- Review and update of its Modern Slavery Risk Framework.

Hollard contractually requires suppliers and strategic partners to perform their services to Hollard in accordance with all relevant laws. As part of our future focus, standard contracts continue to be enhanced and revised to reduce the risk of modern slavery in Hollard's supply chain. In the Reporting Period Hollard strengthened its contracts to include obligations in respect of work health and safety and outline Whistleblower avenues available to suppliers.

Prevention of modern slavery is limited where Hollard has less influence and oversight. There is always a risk of Hollard and its Subsidiaries being indirectly linked to, or contributing to, forms of modern slavery with respect to goods and services further down the supply chain where Hollard and its Subsidiaries have less visibility (for instance, Tier 2 and Tier 3 Suppliers). While further work is needed to increase our influence down the tiers of our supply chain, contractual obligations can assist in the meantime. The introduction of contractual terms with Tier 1 Suppliers is intended to assist in addressing these risks through the supply chain, raising awareness, and monitoring of modern slavery practices.

## TRAINING AND AWARENESS

### AWARENESS-RAISING ACTIONS

Hollard continues to raise awareness of modern slavery risks in business operations and supply chains through:

- Regular regulatory updates to the business;
- Raising modern slavery awareness through meetings with employees from various operational areas of Hollard and its Subsidiaries;

- Issuing existing suppliers and new vendors with modern slavery due diligence questionnaires which included information regarding modern slavery and reporting requirements;
- Updates provided to Hollard and Subsidiary Boards and management committees supplying information on the modern slavery risks and the compliance program undertaken to assess risks; and
- Issuing employee online training module for Global Human Trafficking Awareness (see Employee Training below).

By raising awareness of modern slavery risks amongst employees, Hollard aims to reduce the risk of modern slavery being undetected and facilitate identification of any modern slavery incidents or risks and take remedial action.

## EMPLOYEE TRAINING

Hollard and its Subsidiaries provide various forms of training in respect of its corporate policies including its Whistleblower, Work Health & Safety and Privacy policies to ensure there is an institutional level of understanding of the risks of modern slavery in its business operations.

During this Reporting Period an online awareness training module was launched called Global Human Trafficking Awareness. It was provided to Hollard, HCl and HASSA employees across all operations, including for employees in procurement, risk and compliance, and leadership roles responsible for operations and suppliers. This training was delivered to assist in identifying modern slavery risks and reinforce how to prevent these risks from materialising, identifying legal reporting obligations and clarifying the way an employee can raise concerns/report incidents.

The module was completed by 95% of assigned employees from Hollard, HASSA and HCl by the end of Reporting Period. This is an increase from 91% recorded in the previous reporting period.

## GRIEVANCE AND REMEDIATION PROCESSES

### WHISTLEBLOWER SERVICE

Hollard, and its Subsidiaries, as part of its regulatory framework has established grievance channels through its Whistleblower Policy and other avenues for internal and external parties and consumers to raise concerns regarding modern slavery practices.

Hollard's public website contains a notice regarding its external Whistleblower service provider for all employees, customers and suppliers to use to report concerns of unethical or illegal behaviour including those relating to modern slavery. This external provider offers translation services to ensure accessibility.

Hollard employees are encouraged via the intranet and internal communications to speak up on risk issues or any situation of concern directly to Senior Managers, Human Resources, the Group CEO or anonymously via STOpline (an external service provider where feedback is provided to the Group CEO for appropriate action).

HASSA employees also have access to Hollard South Africa's Ethics Tip Off line where suspicions of criminal, fraudulent, non-compliant or unethical behaviour can be reported. This is operated by an external service provider. Training is provided to all HASSA employees around this service.

In this Reporting Period Hollard has strengthened its precedent contract terms in agreements with suppliers to include information regarding Hollard's Whistleblower reporting available to suppliers.

Relevant whistleblowing incidents are reported under the Whistleblower Policy to the Hollard Boards.

### REMEDIATION PROCESSES

Hollard and its Subsidiaries' remediation processes exist to address a range of adverse impacts on human rights, concerns of misconduct, and allegations of illegal conduct that may be raised. Grievance mechanisms are an integral part of internal policies and processes, and should any incidents/ concerns be reported to Hollard and its Subsidiaries they would be dealt with per applicable regulatory requirements, and policies and procedures on a case-by-case basis.

To assess the effectiveness of remediation processes going forward, Hollard and its Subsidiaries will review and monitor these processes to ensure they are up to date. Regular training and awareness with respect to grievance processes will continue to be provided to employees.

## SUMMARY OF ACTION TAKEN AND ASSESSING EFFECTIVENESS

Hollard is working to identify modern slavery practices in its operations and supply chain and to assess the effectiveness of its actions in managing modern slavery risk.

### ACTION TAKEN IN THE REPORTING PERIOD

In summary, the actions taken by Hollard and its Subsidiaries in this Reporting Period include, but are not limited to:

- Hollard remaining an active member of the Insurance Council of Australia (ICA) industry working group on Modern Slavery, discussing opportunities for industry collaboration and strategies to achieve positive outcomes;
- Continuing to support suppliers through the Modern Slavery due diligence process, communicating with targeted suppliers who may demonstrate a low understanding of modern slavery risks relevant to their business and increasing awareness of modern slavery reporting requirements and assessment of modern slavery risks;
- Continued risk assessment of modern slavery practices in Hollard operations;
- Continuing implementation of modern slavery contractual requirements in new contracts or varied/renewed contracts;
- Strengthening precedent supplier contract terms to include information regarding Hollard's Whistleblower Avenue available to suppliers and to include WHS obligations;
- Development of a revised modern slavery compliance framework;

- Development of a procurement dashboard to inform Hollard of inherent modern slavery risk indicators for new suppliers;
- Developing a Modern Slavery Policy; and
- Increased completion rates of employees of modern slavery awareness training.

### ASSESSING EFFECTIVENESS

Hollard has developed a framework to assess the effectiveness of our actions to combat the risks of modern slavery. This includes the following key indicators and methods:

- Reviewing third-party resources including GSI and the US Department of Labor List of Goods Produced by Child or Forced Labor to ensure risk assessments are current;
- Engaging external subject matter experts to undertake independent reviews of Hollard's actions, certain policies, and revised Modern Slavery Risk Framework;
- Establishing a cross-functional modern slavery working group (including procurement, IT, finance, compliance, HR and legal) to effectively implement actions and share knowledge on preventing modern slavery;
- Monitoring completion rate of Modern Slavery training for both Hollard and its Subsidiaries' employees during the Reporting Period;
- Monitoring completion rate of supplier due diligence questionnaires;
- Monitoring of modern slavery risk indicator dashboard for new vendors via procurement;
- Including modern slavery obligations in new or varied/renewed supplier contracts; and
- Checking grievance reports for any complaints raised in respect of modern slavery including through:
  - Hollard's Whistleblower provider (STOPline) or other internal avenues (notifications to HR, CEO); and
  - Review of supplier responses to due diligence questionnaires.

Hollard utilises the above key indicators to gauge the effectiveness of our efforts in identifying and addressing modern slavery practices within all aspects of our operations and supply chains. To assess the effectiveness of these actions going forward, Hollard will review and monitor these actions to strive to mitigate modern slavery risks, which may occur throughout any part of our business or supply chains. As part of effective oversight, Hollard reports to the Executive Leadership Team and the Hollard Boards as to the progress of the compliance program.

Hollard will strive to regularly review key indicators to further gauge the effectiveness of its actions. Hollard will also continue to build on the training and education provided to employees to enable them to better identify, understand and report on modern slavery, if detected within our supply chain.

## FUTURE ACTIONS

Hollard acknowledges that monitoring effectiveness can be challenging. Hollard intends to continue to demonstrate progress in managing the risks of modern slavery within its business operations and supply chains and to expand its compliance program over time.

Future actions include:

- Monitoring developments with regards to the review of the *Modern Slavery Act 2018* (Cth) and assessing our actions against legislative requirements;

- Annual senior management review of the modern slavery compliance program;
- Engage with and educate suppliers who did not respond to due diligence questionnaire in the Reporting Period to further collaborate and build coalitions of action around Modern Slavery;
- Development of a Responsible Investments Policy as part of Hollard's ESG/Sustainability roadmap;
- Development of a supplier code of conduct;
- Continuing to monitor third-party resources including Global Slavery Index, Responsible Sourcing Tool, US Department of Labor List of Goods Produced by Child or Forced Labor to maintain currency;
- Further developing Hollard's audit processes around supply chains;
- Explore opportunities for further industry collaboration with respect to Modern Slavery responses via the ICA; and
- Continuing to implement new contractual obligations in supplier agreements to monitor modern slavery risks of suppliers and their respective supply chains.

This statement is made pursuant to Section 14 of the Modern Slavery Act and constitutes Hollard's Modern Slavery Statement for the financial year ended June 2023.

This Joint Modern Slavery Statement was approved by the Hollard Boards.

Signed for and on behalf of the Hollard Boards.

*Gary Dransfield*

Chair of Hollard Boards