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AUSTRALIA

# Anti-slavery and human trafficking statement

## Purpose and summary

This statement has been issued to address global concerns regarding Modern Slavery. Multiple laws and regulations have been published such as, but not limited to, the UN Global Compact, the Modern Slavery Act 2015 (UK), Corporate Duty of Vigilance Law 2017 (France), and the Australian Modern Slavery Act 2018.

This statement sets out the steps taken by Sedgwick Australia Pty Limited (ACN 003 437 161) and the entities it owns and controls ('Sedgwick Australia'), to prevent modern slavery and human trafficking happening within our business and our supply chain in accordance with section 16 of the Australian Modern Slavery Act 2018.

Sedgwick Australia provides direction to the entities it owns and controls regarding the management and implementation of modern slavery measures, which is aligned with the approach of Sedgwick International, hence this statement covers the steps taken by Sedgwick Australia and its subsidiaries.

Our ethical values and standards are the foundation of the way we conduct our business. Sedgwick is committed to preventing acts of slavery and human trafficking from occurring within our business and supply chain. We also expect the same commitment from our colleagues and suppliers.

We recognise that slavery and human trafficking exist in the modern world, and that it is a global and growing issue. We, and all of our colleagues, together with those who work with and on behalf of the Group, have a responsibility to ensure no form of slavery or human trafficking exists in our business, our supply chain, or the supply chains of those with whom we choose to partner.

We expect our colleagues, or anyone working with or on behalf of Sedgwick, to raise any concerns they have using the designated reporting channels, so that Sedgwick can take appropriate action.



# Structure of the organisation

Sedgwick Australia is an operating division of Sedgwick International. Sedgwick Australia has 698 employees across all offices in Australia, with our head office located in Sydney. Sedgwick Australia's primary operations and services reflect those of the Sedgwick Group.

The Sedgwick Group is a leading global provider of integrated, technology-enabled, business solutions primarily for the investigation and resolution of insurance claims. We have a broad range of resources, which we utilise to tailor our services to our insurer clients' specific needs in property, casualty, marine, benefits and other lines.

Through the experience and expertise of our 31,000 colleagues, operating in more than 80 countries, we work to remove process complexity, to enable us to provide an efficient customer focused service which meets the needs of our clients and their customers.

Our operation includes several businesses, working on all parts of the risk life cycle, including pre and post loss. These include experts in surveying, engineering, construction, forensic accounting, training, fire origin, environmental risk, and contractor management. Some of these experts will visit claim locations to assess loss/damage and to agree the necessary remediation work. During such visits they will engage with other parties, including our appointed suppliers, and experts appointed by other interested parties. Other colleagues handle claims remotely, either from an office or their own homes. Such handlers will interact with suppliers by email or telephone but will not meet with them.

To deliver our services we work with a range of suppliers. Some of these provide services that support

the Group and our colleagues (e.g. IT services and support functions). Others provide services that align with either our investigation of claims (e.g. medical experts) or the fulfillment of claims (e.g. building contractors). Some of these suppliers contract with us for the services they provide, but others are either acting on behalf of the insurer we are appointed by, or our client's customer.

We seek to ensure that the way in which we choose our business partners and purchase goods, services and facilities, reflects our commitment to environmental, social and governance (ESG) matters, including the prevention of slavery and human trafficking.

To find out more about the nature of our business, please go to [www.sedgwick.com](http://www.sedgwick.com).



**80 countries**



**31,000+ colleagues**



**\$30.8bn in annual claims payments**



**10.1 million new claims annually**



**\$4+ bn revenue**

# Risk and compliance

## Risk evaluation

Sedgwick evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by monitoring our relationship with our partners and ensuring that appropriate due diligence checks of key suppliers is undertaken.

Sedgwick Australia regularly convenes Risk, Audit and Compliance Committee (RACC) meetings. Our RACC is made up of a cross section of executive and national leadership management representatives, who meet to discuss all matters relating to risk management and compliance, including analysing new and emerging risks, and identifying appropriate solutions. The remit the committee includes identifying risk internally and within our supply chain, monitoring potential / emerging risk areas and identifying ways to reduce risks including those of slavery and human trafficking.

We do not consider that we operate in high-risk sectors, and we only work with well-known and proven suppliers who meet our due diligence criteria. Where we identify a potential risk, it is recorded, assessed and remedial action taken.

## Assessing risks

Sedgwick Australia also undertakes a modern slavery risk assessment on its top 10 suppliers ('Risk Assessment'). This was most recently undertaken in May 2023, after the reporting period covered by this statement.

Sedgwick Australia's Risk Assessment found that none of our suppliers are providing us with high-risk goods and

none of them are from high-risk countries. Further, Sedgwick Australia operates in a high-tech, professional and scientific industry and our top 10 suppliers were all classified as low risk. The top 10 suppliers included providers of IT communication services and infrastructure solutions, recruitment services, office fit-outs, disaster restoration services and telecommunication services.

All of Sedgwick Australia's top 10 suppliers either had their own modern slavery statement or completed a questionnaire that was provided to them.

Sedgwick Australia regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in our supply chain by monitoring our relationship with our partners and ensuring that regular due diligence checks of key suppliers are undertaken.

Generally, we do not consider that we operate in high-risk sectors, or locations. We only work with well-known and proven suppliers who meet our due diligence criteria. However, if a potential risk is identified, it is recorded, assessed and remedial action taken.

We ensure all our suppliers adhere to our high standards of social responsibility and ethical dealings. We enforce a strict code of compliance and do not tolerate any form of slavery, human trafficking, or worker exploitation within our supply chains. If we find evidence of a failure to comply with our policies, we will immediately seek to terminate our relationship with the relevant supplier.

# Policies and controls

As part of our commitment to combating slavery and human trafficking we have implemented several policies. These policies have been written by the relevant areas of the business, including legal, colleague resources and risk & compliance and they are subject to routine review to ensure they remain up to date and relevant.

## Recruitment

Our Code of Conduct and Ethics Policy sets out our commitments in certain key areas. These include the creation of a working environment where all colleagues are treated with dignity and respect.

The policy also sets out our workers' rights, including Sedgwick awareness of employee entitlements regarding minimum terms of engagement, annual leave, and sick leave.

Pre-employment screening ensures that appropriate right to work documents are obtained prior to employment.

## Colleagues

Sedgwick Colleagues are expected to abide by the standards set forth in our Code of Conduct and Ethics Policy, Anti-Discrimination & Equal Employment Opportunity Policy, and / or the applicable Colleague Toolkit for Australia. These documents set forth our standards in respect of the way we expect colleagues to behave, including our commitment to ensuring we conduct ourselves in an ethical way, preventing any type of slavery, servitude, human trafficking and forced or compulsory labour. These documents also set out the mechanism by which colleagues can, confidentially, report any concerns they have to the Group using our Ethic Line.

## Whistleblowing

We maintain a Whistleblowing Policy, with an associated independent mechanism for reporting concerns known as Ethics Line. It is principally aimed at our colleagues, but is also available to others working with, or on behalf of, Sedgwick. It encourages the reporting of potential violations of the law and/or Sedgwick policies, including malpractice, unethical behavior, matters potentially in the public interest or other misconduct within the organization. This would include any human rights violations, including those relating to slavery. All reports of alleged wrongdoing are fully investigated, and appropriate remedial action taken.

Our procedures are designed to:

- Establish and assess areas of potential risk in our business and supply chains
- Monitor potential risk areas in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains
- Provide adequate protection for whistleblowers

# Supplier due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted various due diligence procedures.

Our internal policies include undertaking regular reviews of our key suppliers. Our due diligence questionnaires, which are used to structure and record these reviews, include specific questions about the supplier's policies and training on Modern Slavery, and how they work to prevent slavery and human trafficking within their business and their supply chain.

Our service contract with our suppliers requires that they adhere to high standards of social responsibility

and ethical dealings. This includes a requirement that any suppliers with whom we partner commit to trading and operating ethically in their dealings with all parties, including our clients, their customers, other suppliers, stakeholders and public interest groups. Inclusive of our supplier agreements are our standards and our expectations of behaviour, including those relating to the engagement of labour, terms and conditions of employment, treatment of those who work on behalf of the supplier, prevention of discrimination and prevention of child and enforced labour. In addition, we require agreement that the supplier will adhere to employment legislation prevailing in the countries in which they operate.



# Effectiveness

The Company uses key performance indicators (KPIs) to measure our success in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains. These are as follows:

- Ensure all Sedgwick Australia colleagues receive modern day slavery training on induction and an annual basis
- Conduct annual due diligence reviews on a percentage of suppliers/vendors deemed high risk, with a view to expanding the scope of the risk assessment
- Issue annual communication to all colleagues to raise awareness on how to identify signs of modern-day slavery and how to report actual, or suspected, instances



# Training

We invest in educating our colleagues to help them recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programs colleagues are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. Colleagues are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the

consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

As part of our annual training all colleagues in countries where a modern slavery statement is mandated by law are required to complete a training module on modern slavery. It provides information on what modern slavery and human trafficking is and sets out Sedgwick's policy in this regard, and how to report any concerns.



# Further actions and sign-off

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- Continue annual review, and ongoing enhancement of, our existing policies
- Continue to review and update supplier contracts to reinforce our requirements on the prevention of slavery and human trafficking in our supply chain
- Further enhance our training offering for all colleagues

- Enhance our supplier onboarding and annual declaration process in line with development of our ESG program

This Statement on Modern Slavery and Human Trafficking for the year ended December 31, 2022 has been approved by the board of directors of Sedgwick Australia Pty Ltd on June 28, 2023 and by the board of directors of each of its reporting entities that are required to make an annual statement pursuant to in accordance with section 16 of the Modern Slavery Act 2018 (Cth)

This statement was approved on 28 June 2023



**Diego Ascani**  
Chief Executive Officer Australia

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