

# Modern Slavery Statement for year-end 30 June 2021

This statement is made by the EML Group pursuant to *The Modern Slavery Act 2018 (Cth) (Act)*

## Introduction

The term 'Modern Slavery' is used to describe situations where coercion, threats or deception are used to exploit victims and to undermine or deprive them of their freedom. Types of Modern Slavery include human trafficking, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour. EML Group adopts a responsible and ethical approach to its business and rejects any involvement in, or connection to unethical or illegal behaviour.

We want to ensure that all aspects of our business activity, including our supply chains, are free from any form of Modern Slavery.

Our commitment to managing the risks of Modern Slavery is illustrated by the following framework:



## MODERN SLAVERY STATEMENT

### 1. About EML Group

This Statement applies to EML Group which is a partnership between Employers Mutual Limited ABN 67 000 006 486, an Australian owned mutual and ASWIG Management Pty Ltd ABN 52 002 617 012 which provides personal injury claims services across various industries including workers insurance, general insurance and life insurance.

We are committed to using our established risk management principles and other controls to prevent modern slavery in any of its manifestations across the EML Group. We strive to address modern slavery risks, potentially:

- **CAUSED** by our organisation, where we can act to cease or prevent the risk and eliminate the impact.
- **CONTRIBUTED TO** by our organisation, where we can act to cease or prevent our contribution to the risk and work proactively with supply chain stakeholders to eliminate the impact.
- **DIRECTLY LINKED TO** our organisation, where we can use leverage to influence entities that are causing the risk to take action. If we cannot use leverage with an entity to influence behavioural change and remedy the impact, we will consider terminating our relationship with that entity and seek alternative supply chain partners.

### 2. Our Business and its Structure

EML Group is a personal injury claims third party administrator (TPA) for personal injury insurance claims management across the workers insurance, general insurance and life insurance industries. For over 110 years, Australians have turned to us for our claims expertise and personalised support in helping people get their lives back. People, building and technology resources are provided to EML Group through a central management company known as Employers Mutual Management Pty Limited.

### 3. Our Operations and Supply Chain

Entity	Main Operations	Supply Chain
EML Group	<ul style="list-style-type: none"><li>• Claims management</li></ul>	<ul style="list-style-type: none"><li>• Professional services companies</li><li>• Resources, people, technology, rental/leases, general office supplies</li><li>• Group banking facilities</li><li>• Claims intermediaries and providers</li></ul>

#### **4. Risks of Modern Slavery Practices in our Operations and Supply Chains**

EML Group utilises common policies and procedures to identify, measure, evaluate, monitor, report, control and mitigate material risks.

Furthermore, when EML Group outsources material business activities to external suppliers, APRA requires that these are subject to appropriate due diligence, approval and ongoing monitoring. EML Group is diligent in identifying and addressing risks to our operations and supply-chain to fulfil our risk management requirements.

Whilst we are confident that the risk of us causing, contributing to, or being directly linked to modern slavery risk is low, this new and emerging area of risk has been incorporated into our risk management process. It has been further reviewed during 2021 resulting in the development of a risk-based approach to modern slavery risk, documented in this Statement, including:

- Supplier due diligence.
- Supplier profiling – to identify inherently higher risk industries.
- A risk-based online modern slavery questionnaire.

These elements have been incorporated into the EML Group risk review program since the second calendar quarter 2021.

#### **5. Risk Assessment and Mitigation**

EML Group operates executive management and Risk Management Policies and Frameworks aligned with ISO31000 Risk Management guidelines and certified to ISO27001 Information Security Standard for technology. This is supported by a Risk Appetite Statement where the Boards specify and agree to the level of risk it is prepared to tolerate in a number of risk categories. EML Group has:

- A low tolerance to unknowingly being involved in modern slavery – we undertake due diligence to discover whether modern slavery is caused or contributed to by us and whether we are directly linked to modern slavery through our suppliers and/or our suppliers' direct providers.
- A low tolerance for threats to the safety and wellbeing of people – we take steps to examine and prevent any modern slavery risks identified in our operations or supply-chain.
- A low tolerance to reputational risk – we are proud of our brand and reputation. We reject any involvement in, or connection to unethical or illegal behaviour that could tarnish our brand and reputation.
- A low tolerance for regulatory compliance risk. EML Group has regulatory obligations to report material breaches of its risk management frameworks and outsourcing arrangements, it is in our best interest to avoid modern slavery risks.

## **6. Due Diligence and Supply Chain Assurance**

During the financial year 2020 / 2021 we:

- Briefed the executive management and the relevant Boards within the EML Group on emerging modern slavery risk management requirements.
  - Updated Risk Appetite Statements and Risk Management Policies and Frameworks to address modern slavery risks.
  - Included modern slavery risk management as a standing agenda item in our monthly risk management forum meetings.
  - Updated supplier engagement checklists to include modern slavery risks for new suppliers and contract renewals including terms of trade.
  - Identified existing material supply contracts based on three criteria:
    1. Major suppliers by spend to a defined dollar threshold.
    2. Suppliers listed in the regulated entities' registers of material of outsourced suppliers.
    3. Suppliers that may present a geographical supply chain risk, where we know, or are reasonably confident, that a current or prospective supplier has operations in countries and regions that have a major exposure to modern slavery practices.
- Our source for this information is the latest Global Slavery Index published by the Walk Free Foundation. Current and prospective suppliers will be asked if they have operations in particular 'at risk' countries listed in Africa, The Americas, Arab States, Asia and the Pacific, Europe and Central Asia.

We commenced with item 1:

- We interrogated the ABS modern slavery database to extract and examine our suppliers' statements, where they are available.
- We asked relationship managers to request statements from suppliers that have them but are not required to publish them.
- Where suppliers do not have statements, we invited them to complete EML's short online modern slavery questionnaire.

In financial year 2021 / 2022, we will complete items 2 and 3.

## **7. Building Capability and Measuring Effectiveness**

We fully combined modern slavery risk management principles into our risk management and procurement processes beginning on 1<sup>st</sup> April 2021. EML Group has built experience and capability throughout the organisation and amongst prospective and current suppliers by:

- Addressing the due diligence and supply chain assurance measures noted in section 6.
- Building awareness across the organisation about modern slavery risks and our commitment to addressing them.
- Providing education about modern slavery risk management to nominated individuals with risk management, procurement or supply chain relationship management functions.
- Preparing modern slavery risk management information material for current and prospective suppliers.

## **8. Engagement with Supply Chain Stakeholders**

Our key approach to supply chain management is partnership. We are committed to collaborating with our supply chain partners to develop strategies to assess and manage modern slavery risks. We do this by:

- Ensuring we are confident that we have correctly assessed new suppliers who enter our supply chain.
- Encouraging our suppliers to monitor their own, and their suppliers' compliance with our modern slavery risk management principles and to correct any identified deficiencies.
- Requesting suppliers to notify us if they become aware of an actual breach or reasonable likelihood of breaching of modern slavery risk management principles and by providing tools (e.g. portals and helplines) to enable timely reporting.
- Sharing appropriate knowledge and information with our suppliers.

## **9. Reporting**

Reporting of modern slavery risks is an integral part of our risk management process, which includes:

- Regular risk reports to executive management and the EML Group Insurance Management Partnership.
- Quality Assurance and performance management of suppliers through periodic checks and audits.
- Addressing breaches of risk tolerances.
- Acting upon anonymous reporting of issues or whistleblowing relating to modern slavery risks.

## **10. Continuous Improvement**

Over the next 12 months, we are committed to improving the modern slavery risk management framework described in this statement, including:

- Continuing to provide internal education and awareness.
- Engaging stakeholders on this issue.
- Preparing our first report in line with reporting requirements.

Modern slavery risk management requires continuous commitment and ongoing collaboration with suppliers. Over the next 2 years, we will:

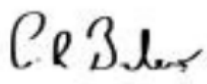
- Enhance analysis and reporting of our supply chain.
- Amend supplier contracts, where possible, to incorporate modern slavery clauses.
- Formalise reporting mechanisms and procedures for suppliers.

## 11. Consultation and Approval

The EML Group Risk Management Department updated this Modern Slavery Statement after undertaking a review of EML Group operations, supply chain, procurement, consideration of modern slavery risks and the development of a risk based approach to managing modern slavery risk through the EML Group triannual risk review program.

Consultation was undertaken across the EML Group via the Insurance Management Partnership and engagement of business unit risk managers.

This Statement for the EML Group was approved by the Partnership, which is the principal governing body of the EML Group, on 24 November 2021 and ASWIG Management Pty Ltd on 24 November 2021.



Paul Baker

**Chair**

**Employers Mutual Limited**



Anthony Fleetwood

**Director**

**ASWIG Management Pty Ltd**