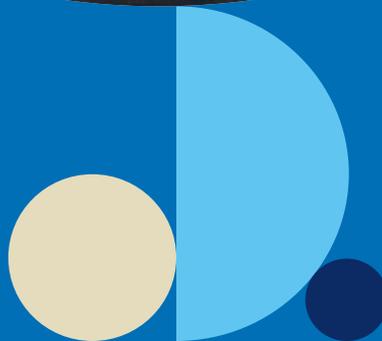


# Modern Slavery Statement 2022



## Statement Overview

This Modern Slavery Statement (**Statement**) outlines the submission by Zurich Financial Services Australia Limited (**ZFSA** or **Zurich Australia**) in response to the *Modern Slavery Act 2018* (Cth) (**the Act**). This is ZFSA's third annual modern slavery statement.

## Entities covered by this joint Statement

This joint Statement covers ZFSA, ABN 11 008 423 372, and the following Australian subsidiaries:

- Zurich Australia Limited ABN 92 000 010 195
- Zurich Services (Australia) Pty Limited ABN 17 627 298 337
- Zurich Investment Management Limited ABN 56 063 278 400
- OnePath General Insurance Pty Limited ABN 56 072 892 365
- Zurich Australian Insurance Limited ABN 13 000 296 640
- Zurich Assure Australia Pty Limited ABN 58 657 804 736

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## Acknowledgment of country

Zurich Australia acknowledges Traditional Owners of Country throughout Australia and recognises the continuing connection to lands, waters and communities. We pay our respect to Aboriginal and Torres Strait Islander cultures; and to Elders past and present.

## Our commitment to combatting modern slavery

Zurich Australia understands and is committed to the protection of international human rights within our sphere of influence. Our approach to modern slavery is underpinned by our core values and informed by the requirements under the Act and the United Nations Guiding Principles on Business and Human Rights.

Modern slavery is not tolerated within any part of the Zurich Australia business or supply chain, and we strive to be socially responsible in our practices and work hard to avoid being complicit in human rights abuses.



## Zurich's Values

Zurich Australia is part of the global group of companies (**Zurich Group**) headed by Zurich Insurance Group Ltd (**ZIG**). We are passionate about our purpose to create a brighter future together and we aspire to create a positive impact as an insurer, investor, financial advice provider and employer.

Our commitment to respecting human rights is part of the Zurich Group's Code of Conduct which applies to all Zurich Group employees and Zurich Group subsidiaries worldwide.

ZIG is a signatory to a number of international standard commitments, such as the United Nations Global Compact and United Nations Sustainable Development Goals.

Over the past 12 months, Zurich Group has continued to move forward on its sustainability journey. The Zurich Group approach hinges on three focus areas – Planet, Customers and People. In line with our Zurich Group Sustainable Sourcing program, we are pleased to note that 71.5% of Zurich Group's managed procurement spend is with suppliers that meet or exceed the key expectations of the Zurich Group Supplier Code of Conduct (**SCOC**), pursuant to the supplier's self-assessment. While this falls slightly short of Zurich Group's target of 75 percent, the Group remains committed to driving sustainability performance within the supply chain.<sup>1</sup>

1. Zurich Insurance Group Annual Report 2022 – 'Integrated Sustainability Disclosure.'



## A few words from our Head of Strategy and Sustainability

As Head of Strategy and Sustainability, Shaneen Marshall is responsible for managing Zurich Australia's sustainability strategy at an enterprise level and driving within Australia and New Zealand, Zurich Group's global ambition to be one of the most responsible and impactful businesses in the world.

At Zurich we define Sustainability to include three things: People Sustainability, Planet Sustainability and Customer Sustainability. At the intersection of Customer and People sustainability is People Positive Solutions.



Our commitment to creating a brighter future together saw the establishment of a local sustainability working group which helped to develop our own local sustainability strategy, whilst taking advantage of the strong support and lead from the Zurich Group.

We continue to initiate and track these actions towards our targets and implement our strategy through this working group and regular reporting. Within our operations and together with our partners throughout our value chain; we are focussed on building and enhancing People Positive Solutions."





Founded  
**150**  
years ago

# Zurich Australia's Corporate Structure and Operations

## About Us

Founded 150 years ago and with 60,000 employees globally, ZIG is the ultimate parent of the Zurich Group, a leading multi-line insurance provider with a global network of subsidiaries and offices in Europe, North America, Latin America, Asia-Pacific and the Middle East. Zurich Insurance Company Ltd (**ZIC**) is the parent company of Zurich Group's operations in Australia.<sup>2</sup>



### Zurich Financial Services Australia

Ultimate holding company for the Australian group, principal employer and service provider.

### Zurich Australian Insurance Limited

General Insurance provider specialising in wholesale insurance for small business, corporate and multinational companies.

### Zurich Australia Limited

Provider of direct and retail life insurance products such as income protection, TPD and trauma cover.

### Zurich Services (Australia) Pty Limited

Employment services company.

### Zurich Assure Australia Pty Ltd

Provider of financial advice.

### OnePath General Insurance Pty Limited

General insurance provider specialising in consumer protection insurance.

Current as of 31 December 2022

### Zurich Australian Insurance Properties Pty Limited

A property company (non-reporting entity).

### Zurich Investment Management Limited

Fund manager for retail and commercial clients across a range of asset classes.

<sup>2</sup> Our structure has largely remained the same throughout the reporting period with a few exceptions. On 1 August 2022, OnePath Life Limited's life insurance business transferred to Zurich Australia Limited under Part 9 of the *Life Insurance Act 1995* (Cth). On the same date, Zurich Australia set up a new advice business known as Zurich Assure Australia Pty Limited. For transparency, where our structure, operations and supply chain have remained the same over the reporting period, we have re-stated the same information in this statement as our previous statement.

## Zurich Australia Supply Chain

We are committed to sustainable sourcing practices and have integrated social, ethical and environmental considerations into our supplier selection process.

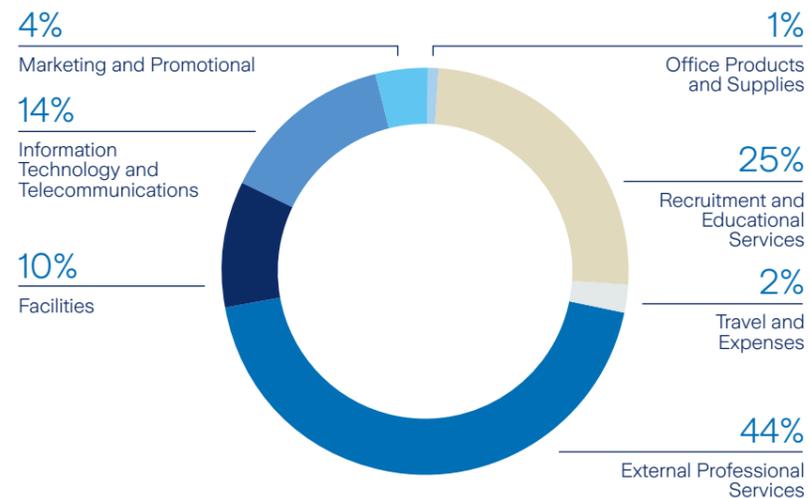
Our Supplier Code of Conduct (**SCOC**) sets minimum expectations of our suppliers, namely:

- to respect human rights and operate labour standards that meet the relevant Principles of the UN Global Compact and the nine International Labor Organization (**ILO**) conventions considered fundamental to the rights of human beings at work,
- to foster a work environment where its employees treat each other with fairness and understanding and that they do not tolerate harassment, discrimination or bullying in the workplace. Employees must be provided with means to raise any such concerns and suppliers shall not tolerate retaliation against any employee who reports a concern in good faith, and
- to keep their working areas clean, healthy and free from hazards. Suppliers must promptly address and report any safety or health concerns, risks or hazards to Zurich Australia, where relevant.

As a provider of financial services, the ethical and modern slavery risks associated with our operations and supply chains are generally low, compared to some other industries. Nonetheless, Zurich Australia is committed to effectively managing and monitoring its supply chain to enable any new or emerging modern slavery risks to be identified in relation to the treatment of employees/workers and how international human rights obligations are upheld.

For this reporting period, our supplier expenditure remained relatively similar to our last reporting period. For the current reporting period, our expenditure is approximately \$375 million and our supply chain composition is 789 suppliers. The figure below shows a breakdown of our spend by category:

Figure 1. Supplier Categories



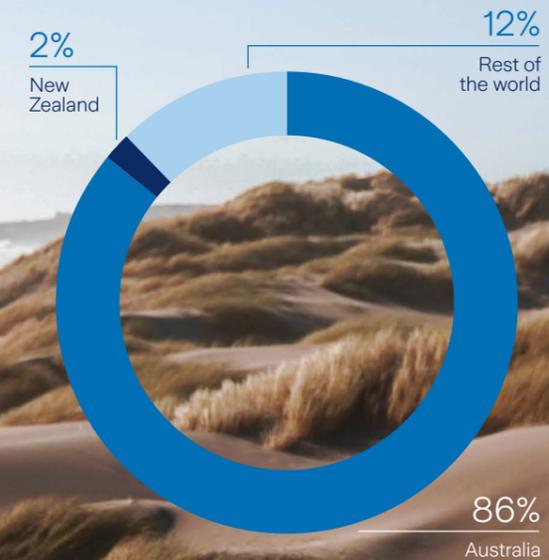
Supplier expenditure in 2022 approx.

**\$375m**

and our supply chain composition is

**789** suppliers

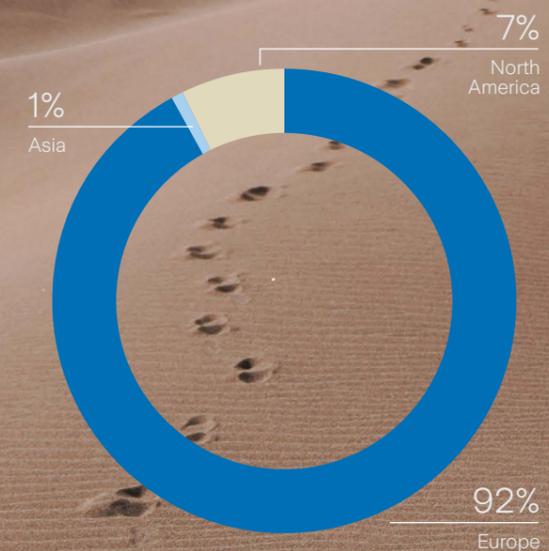
Figure 2. Supplier Geography



**86%**  
of our suppliers are based in Australia

The majority of our suppliers are located within Australia. For suppliers not located within Australia, the geographical distribution of our supply chain is centred in Europe and North America: (figure 2 and 3).

Figure 3. Supplier Geography – Rest of the world



**99%**  
of our remaining suppliers are based in Europe and North America

# Building on our efforts from 2021

Over the 2022 reporting period, we have taken further action to assess and manage our modern slavery risks. Notable activities include:

## Operations & People

Our People and Culture team are refreshing some of our broader safe working environment policies which includes enhancements to our Diversity, Equity, Inclusion and Belonging (DEIB) Policy and introducing a new Respect at Work program.

Following the appointment of Zurich's Head of Strategy and Sustainability, we established a Sustainability Working Group in November 2022 and have developed a local strategy which drives action across three pillars: People Sustainability, Planet Sustainability and Customer Sustainability. In line with our People and Customer sustainability pillars, our local strategy aims to generate People Positive Solutions throughout our operations and through continued engagement with partners in our value chain.

## Supply chain

We endeavour to work with suppliers who share our values, and we expect high standards of ethical conduct from those who represent us or do business with us. We expect our business partners to adhere to the spirit of our SCOC and embrace high standards of business conduct.

Since the 2021 Statement, Zurich Australia has made improvements to how we manage our supply chain.

Zurich Group have introduced measures to support how we do business with third parties. Some significant improvements, which have been cascaded through to Zurich Australia, include:

- a revised Third-Party Risk Policy Manual which establishes a new Third-Party Governance Framework, and
- a global inventory of critical third-parties.

The Third-Party Governance Framework works in combination with other tools in our business to support how we onboard and govern suppliers, in compliance with the Zurich Group Risk Policy and Risk Policy Manual.



# Identification of modern slavery risks across Zurich Australia's Operations and Supply Chains

Zurich Australia condemns all forms of modern slavery and human trafficking.

Zurich Australia considers modern slavery to include trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and child labour. We understand that we can cause or be indirectly linked to modern slavery practices through our supply chain.

At Zurich Australia, the prevention, detection and reporting of modern slavery risks or conduct in any part of our business or supply chains is the responsibility of every individual working for Zurich Australia or under our control. These obligations are socialised to our employees via training as well as policies and procedures.

Zurich Australia understands that appropriate and timely identification of modern slavery risks is the first step in effectively managing and preventing harm.

Consistent with the previous reporting period, we determined that our risk exposures lie predominantly in the following three areas:

- 1 Risks in our operations
- 2 Risks in our supply chain, and
- 3 Risks in our investments

## Operations & People

Our risk assessment looked at our evolving workforce and whether any of our employees could be subjected to modern slavery itself or exposed to modern slavery risks.

To determine this, we assessed:

- workforce composition,
- workforce location,
- workforce age and nationality,
- the accessibility and adequacy of employee grievance channels, and
- our employees' knowledge of modern slavery risk factors.

A breakdown of our workforce distribution for the current reporting period is as follows:

<b>6%</b>	<b>3%</b>	<b>0%</b>	<b>0%</b>
of employees are contracted or managed by third party employers	of employees are under the age of 25	of workers are outside of Australia and New Zealand	of workers are low skill migrant workers

### Risk Rating & Rationale

Our modern slavery risks in this area are considered **Low**.

Our People and Culture policies and procedures support a recruitment process that is designed to ensure that staff are recruited and employed in a fair, lawful and professional manner. Our contracts and Employee Enterprise Agreements are framed to meet the requirements of the *Fair Work Act 2009* (Cth) and modern awards, with regard to remuneration and working standards.

Our low-risk rating is also supported by the current workforce statistics: 100% of permanent staff are based in Australia and New Zealand, signalling no change from the previous reporting period.

In addition to this, Zurich Australia understands the importance of ensuring our employees have a comprehensive understanding of modern slavery and how to identify associated risks.

For this reporting period, we again delivered general modern slavery training as part of our mandatory compliance training modules. Our general training is rolled out annually to all employees and includes information on identifying modern slavery risks, as well as how to access grievance channels if modern slavery concerns arise. Targeted training was also delivered in September 2022 to business units with a higher exposure such as our procurement team.

As we continue to support and uplift the learning and development of our people, the Zurich People and Culture team have introduced a Respect at Work program which provides people manager and foundational learning sessions to all employees. The course includes information on how to raise concerns.

## Global mobility program – Case study

We believe our organisation benefits immensely from the talent of our people. Our People and Culture team administers a Global Mobility Program (**the Program**), which offers global career opportunities for Zurich Group employees.

An assessment of the Program found that the Program scope captures regions with varying human rights standards and employment/labour standards. Further, the assessment also considered potential issues associated with varying contractual terms that may not capture modern slavery risk, and the lack of oversight from the 'home' country management and human resources teams.

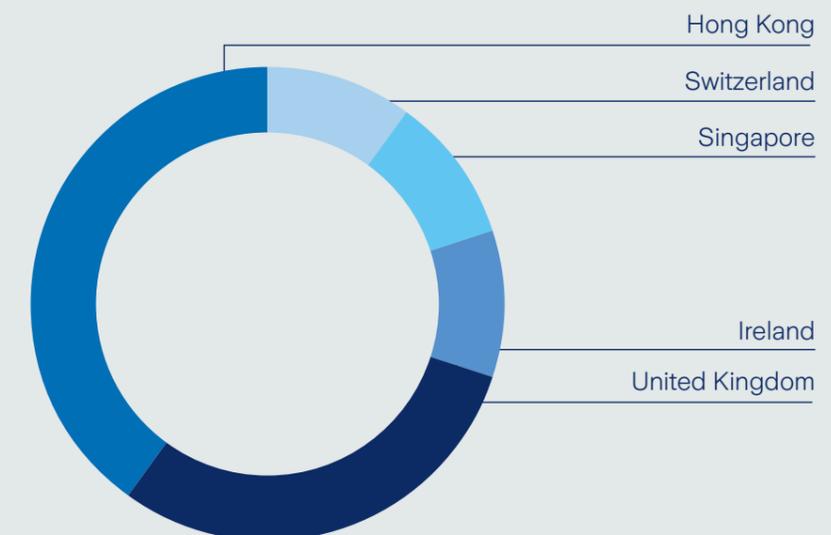
The Program's risk has been assessed as **Low**, in consideration of the below factors.

To mitigate any potential modern slavery risk, as the host country, we ensure we provide fair employment terms and conditions and align our practices to be compliant with legislation as well as our Global Mobility policies and guidelines. We also engage with our migration partners to assess and lodge a visa application (where required) to ensure employees have correct working rights. We ensure our employment terms and conditions are compliant with the host country's employment law.

As the host country, we ensure salary benchmarking is undertaken for the role with remuneration provided to the employee in the host country's currency in line with local laws. In addition, the Program participant's contracts are designed to ensure consistency with local employment and fair work laws, enterprise agreements and national employment standards.

Over the past 12 months, Zurich Australia has managed 10 intra-company transfers as the host country, under our Global Mobility policies. More than half of these employee transfers have been used to fill roles in the information technology space.

The geographical breakdown of intra-group company transfers is:



## Supply Chain

We have assessed the potential for our business to cause modern slavery risks or harm, both directly and indirectly, through our supply chain.

Whilst we have not identified any specific instances of modern slavery or harm arising or impacting organisations, employees or consumers as a result of modern slavery risks, we have identified the following areas within our supply chain as being potentially higher risk for modern slavery. Our Risk Assessment considered vulnerabilities associated with our supply chain composition and base, including sector and industry, products and services, geographical location, expenditure and entity risk, as well as considering suppliers in the following higher risk industries:<sup>3</sup>

- facilities services – i.e. cleaning, security personnel, general building maintenance,
- printing, stationery and mail house services,
- hospitality and catering services,
- travel services,
- IT software, and
- external professional services – i.e. third party labour hire services.

Using the above we then identified suppliers performing these categories of services and issued them with a 'High Risk' supplier questionnaire.

### High Risk Supplier Questionnaire

Suppliers who have a human element to their operations and/or operate in locations and sectors with higher indicators of modern slavery risk, were issued a Questionnaire designed to confirm how the supplier has implemented internal controls to prevent and remediate modern slavery risks and provide Zurich Australia with comfort around their overall modern slavery framework.

For the current reporting period, we modified our Questionnaire to elicit a better understanding of how our suppliers interact with their own suppliers, how ongoing monitoring takes place, and in light of an enhanced global focus on environmental, social and governance (ESG) matters, whether they have made changes to their existing modern slavery framework. For the current reporting period, we received a response rate of 91%.

Encouragingly, supplier responses received during this reporting period showed greater consideration and understanding of modern slavery risks. For instance, a number of suppliers advised that they had amended their employee policies and guidelines to explicitly address modern slavery risks - this was the case even for suppliers that are not bound by the Act.

For our larger suppliers, analysis of their responses revealed that 76% had undertaken further due diligence activities on their supply chains and of these, 20% utilised third-party professional services to conduct risk assessments to support their analysis. Therefore, it was unsurprising that most of the suppliers in this cohort have more established risk frameworks. Most suppliers confirmed that they had established controls to address modern slavery risks such as a relevant supplier code of conduct for their own suppliers.

For our smaller suppliers, we took a similar approach and sent out a tailored questionnaire relevant to the scope (e.g. expenditure) of the supplier arrangement. Analysis of the smaller supplier responses revealed that almost 80% have procedures or forums to enable employees to report concerns and escalate issues regarding their terms of employment/employment conditions, or any concerns relating to third party suppliers. Of this cohort, 62% had some type of formal policy/procedure in place such as a whistleblowing policy, human rights policy and/or grievance channel. Given most of the suppliers in this category were using human services, it is unsurprising that their frameworks and responses were aligned to anti-modern slavery practices.

### Risk Rating & Rationale

The risk associated with Zurich's supply chain is considered to be **Low-Medium**.

Our Procurement function have risk management measures in place to manage risks arising from Zurich Australia's supply chain - these include our supplier due diligence framework (which asks questions about the supplier's modern slavery framework and controls); ongoing monitoring of suppliers through relationship management meetings, regular attestations, and more recently, the Third-Party Governance Framework. A review of the due diligence and supplier review templates for this reporting period did not identify any instances of modern slavery harm.

3. These risks are general in nature and do not identify any actual instances of modern slavery harm.

Further, as part of our sustainable sourcing program, Zurich Group conducted a human rights risk assessment to determine the Group's exposure to potential human rights violations in the supply chain.<sup>4</sup> The analysis identified a limited potential for violation of certain human rights, though the Group's overall exposure to such incidents is considered low. The assessment found that labour standards and workplace practices operated by Group suppliers are a critical factor in the likelihood of a human rights violation occurring. Using data and reports from reputable Non-Governmental Organisations (NGOs) and internal expert judgement, Zurich Group has identified high-risk countries and high-risk goods and services. The output from the risk assessment has been integrated into the Third-Party Governance Framework.

In our previous statement, we reported on Zurich's International Programs (IPZ), a specialised co-insurance program supporting our General Insurance customers across the world. During the reporting period, Zurich Australia, via IPZ, implemented insurance programs for customers operating in countries located in Europe, Africa, Asia and South America. However, for reasons unrelated to modern slavery risks, Zurich Australia decided to cease offering this service from 1 October 2022 and such international insurance programs it has coordinated are in run-off, lowering our overall exposure to modern slavery risks associated with regions with poor labour standards.

4. Zurich Insurance Group Annual Report 2022 – 'Integrated Sustainability Disclosure.'

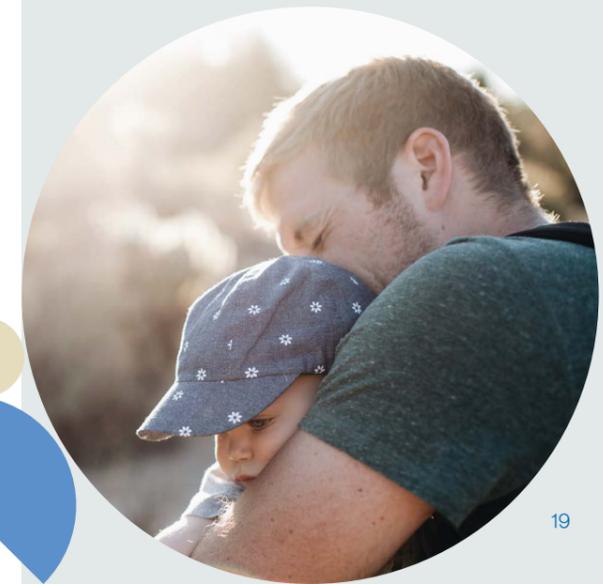
## Investments

### Risk Rating & Rationale

We have assessed this risk as **Low**.

The risk assessment undertaken in respect of our investments business, Zurich Investment Management Limited (ZIM), considered whether our external fund managers' trading activity has caused, contributed to, or is directly linked to modern slavery harm.

Our external fund managers are subject to pre-selection checks designed to ensure they have integrated modern slavery and other ESG considerations into their investment framework. Responsible investment is an essential pillar in our Group Sustainability Strategy. Our fund managers are required to complete an annual questionnaire developed by the Financial Services Council (FSC) which includes, amongst other questions, a response to labour management and modern slavery.



# Actions taken to address risks identified within Operations and Supply Chains

Zurich Australia has made enhancements to the way we address modern slavery risk, building on foundational controls reported on in the previous statement.



## Operations

### Zurich Australia Modern Slavery Policy and Framework

Our employee-facing Modern Slavery and Human Trafficking Policy (**Policy**) is subject to regular review by the Compliance function and is supported by the Modern Slavery Framework which describes the modern slavery controls we have in place, including our remediation framework. The Policy provides an overview of Zurich Australia's modern slavery risks and controls, and key values modelled off Zurich Group's Code of Conduct. Additionally, the Policy contains information on how employees can access a confidential Ethics Line or other grievance mechanisms.

Zurich Australia believes that employee education is a key control underpinning the Policy. In 2022, we delivered general and targeted mandatory training to employees to provide them with guidance around identification and escalation of modern slavery risks. All employees are required to complete a financial crime training module which includes a general modern slavery component. Additionally, targeted training is delivered to groups based on their level of exposure to modern slavery risk – examples of higher risk exposed teams and employees include supplier relationship managers, Compliance, Procurement, People and Culture and operational managers.

### Zurich Australia Remediation Framework

For the current reporting period, we are pleased to report that we have not had to take any of the actions outlined within the Zurich Australia Modern Slavery Remediation Framework as no instances of modern slavery were identified. Nevertheless, at a base level, the Remediation Framework relies on a few key guidelines and steps. The Modern Slavery Remediation Framework outlines mandatory actions if modern slavery conduct is identified within Zurich Australia's supply chain. Further action plans are agreed upon by the relevant Zurich Australia and supplier stakeholders, as required.

### Zurich Australia Whistleblower Framework

Zurich Australia's whistleblowing framework includes an employee-facing policy which provides information on how to access our confidential on-line and phone ethics line. The ethics line is supported by the Whistleblowing Policy and together, they allow confidential reporting of improper or unethical conduct. The Policy allows individuals to report concerns anonymously and aims to empower all individuals to proactively raise concerns.

In addition to this, Zurich Australia employees can also report concerns via our incidents and breaches database, through their line manager, to our People and Culture team, and to our Legal and Compliance teams.

### Zurich Australia People and Culture controls

Zurich Australia employees are supported by a number of People and Culture policies, procedures and resources. At the base level, Zurich Australia employee contracts are subject to the provisions of the *Fair Work Act 2009* (Cth) and modern industry awards. Our organisation remains committed to providing fair working conditions for all employees including transparent terms and conditions of employment, leave entitlements, financial and non-financial benefits and remuneration no lower than the minimum wage.

Additionally, we have introduced a new risk and governance framework training module which encourages all employees to embody courageous, curious and responsible behaviours. Zurich Group have also released a refreshed Code of Conduct training module which speaks to respecting human rights, how to identify modern slavery risk while completing supplier due diligence, and how to report concerns. The Code of Conduct training is mandatory for all Zurich Group employees and is rolled out on an annual basis.



## Supply Chain

We expect our suppliers to contribute to society in a positive way by respecting human rights and embracing diversity and inclusion. We encourage our suppliers to go further and generate positive social impact by seeking out opportunities to engage with social enterprises and implementing broader social impact programs. This is embodied in our Supplier Code of Conduct.

Our business approach is to work with suppliers to address any areas where they don't meet sustainability expectations. We take our sustainability commitment seriously, so where suppliers are unable or refuse to embed minimum sustainability standards, we'll review the relationship and consider further actions.

The Supplier Code continues to complement our contractual agreements with our suppliers and is publicly available on our website.

Increased monitoring and oversight of our suppliers is supported by the introduction of the Third-Party Governance Framework which provides a framework of minimum standards that apply to the onboarding and management of third parties. Where indicators of modern slavery harm are flagged, there is a referral process in place to investigate or resolve, as appropriate, any issues identified during the due diligence process.

[Zurich Australia outsourcing framework, supplier due diligence, and ongoing monitoring of suppliers](#)

### Zurich Australia Outsourcing Framework

Zurich Australia's sustainable sourcing program aims to enhance the resilience of our supply chain and comprises of three pillars which address environmental, social and ethical factors. The ethical factors include consideration of anti-modern slavery principles and applicable legislation. The objective of the program is to align suppliers with our values and be transparent about our Supplier Code of Conduct expectations which are embedded into our service agreements with suppliers.

Over the course of the past 12 months, our local Procurement function have sent out questionnaires to a number of Zurich Group identified medium-high risk suppliers, based on risk indicators which include:

- sectors and industry,
- nature of goods or services, and
- geographical location.

This questionnaire asks suppliers to conduct a self-assessment to determine how they perform against the Supplier Code. No adverse responses have been identified from the targeted suppliers, and our local Procurement function aim to roll out this questionnaire to other suppliers over the next 12 months.

### Due Diligence

Our supplier selection process has remained the same over the previous reporting period and includes specific questions on modern slavery and other ESG factors. Due diligence questionnaires ask prospective suppliers to confirm adherence to anti-modern slavery practices and other human rights standards such as not using forced labour. Negative responses to modern slavery questions are flagged to our Compliance team for further review.

In addition to the above, and as identified in our previous statement, Zurich Australia executives must attest on an annual basis that due diligence processes are being followed and implemented appropriately.

### Ongoing Monitoring

Zurich Australia relationship managers have oversight of their third-party arrangements through regular contact with suppliers. For our material and critical suppliers, relationship managers conduct annual reviews which involve the supplier confirming compliance with the Modern Slavery Act, amongst other regulatory requirements. The Zurich Australia Risk and Compliance teams also review supplier responses provided as part of the annual process.

Furthermore, our Investments Compliance team perform a bi-annual compliance review of appointed fund managers. This involves sending out a Modern Slavery questionnaire and escalating adverse responses as required.



## Effectiveness of Zurich Australia's actions

As our modern slavery framework matures, we continue to review the processes in place to assess whether we have been managing modern slavery risks effectively. For the reporting period, we are pleased to report that no instances of actual modern slavery harm have occurred as part of our operations, supply chain or investments.

### Governance

The Boards provide formal governance oversight across Zurich Australia entities in relation to modern slavery.

The Zurich Group Board approves the Group's sustainability strategy and objectives, with direct impact on our local Zurich Australia Sustainability Strategy and goals.

Our executive leadership team provide oversight of modern slavery risks in their respective areas.

### Risk Assessment and Management

In considering the best risk assessment approach, we have regard to a number of factors such as changes in business structure, external environment and supply chain; as well as investment and performance goals. Given that most of the metrics feeding into these factors remained static over the past year, our 2022 risk assessment remained largely unchanged.

### Regular review of Policy and Framework

Zurich Australia's Modern Slavery Policy and supporting framework are subject to regular review to ensure we meet regulatory and best practice obligations.

## Consultation

We have engaged with representatives across different business units to assess, advise and contribute to the production of the Statement. The Statement has been shared with each of the Zurich Australia subsidiaries, and the ZFSA Board has approved this Statement.



# 2023 and beyond

## Planned for 2023

- Continued engagement by our local Procurement team with suppliers on our Supplier Code of Conduct including questionnaires. As part of this, we expect supplier training videos and other reference material to be rolled out over the next 12 months.
- Integration of modern slavery as a standing agenda item in our Sustainability Working Group.
- Continued focus for our relationship managers to include modern slavery related controls in management of our material and critical suppliers such as expanding on annual attestations to include targeted labour/supply chain modern slavery questions.
- Deliver general and enhanced training to all employees.

We also look forward to examining any proposed changes resulting from the review of the Act. We will work towards aligning our Modern Slavery policies and procedures to support regulatory expectations and best practice.



# Endorsement

This joint Statement has been approved by the Board of ZFSA on 26 June 2023. The ZFSA Board has approved this Statement on behalf of all Zurich Australia reporting entities:

- Zurich Australia Limited
- Zurich Services (Australia) Pty Limited
- Zurich Investment Management Limited
- OnePath General Insurance Pty Limited
- Zurich Australian Insurance Limited
- Zurich Assure Australia Pty Limited

The Statement is signed by the Chief Executive Officer of Zurich Australia and New Zealand, covering each reporting entity:



Justin Delaney  
Chief Executive Officer,  
Zurich Australia and New  
Zealand

29 June 2023



Zurich Financial Services Australia Limited  
ABN 11 008 423 372, AFSL 232510  
118 Mount St, North Sydney NSW 2060  
[www.zurich.com.au](http://www.zurich.com.au)

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The trademark depicted is registered in the name of Zurich Insurance Company Ltd  
in many jurisdictions worldwide.

APRR-019941-2023

