

Modern Slavery Statement 2022-23

SUNCORP



Building futures and
protecting what matters

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Statement from Group CEO

Suncorp Group remains committed to respecting human rights and protecting people against modern slavery in Australia and globally. Our purpose – **building futures and protecting what matters** – continues to guide us in light of the significant ongoing challenges facing our communities.

This is Suncorp Group's fourth Modern Slavery Statement and details our progress over the 2022-23 financial year. This year, we continued to mature our understanding of the potential risks of modern slavery in our operations and supply chains. This included assessing and documenting the risks in our insurance value chain and categorising key high-risk commodities throughout our supply chain.

To help our people, we reviewed our education materials and created a new guideline to give our employees clear instructions on how to report a potential incident of modern slavery. Further updates will be introduced in FY24 to ensure our people understand how Suncorp could be exposed to modern slavery practices through our business relationships.

We continue to evolve our response to modern slavery and will ensure our processes put people at the centre to minimise the risk of harm. This year, we developed a roadmap for a new Human Rights commitment, which will outline our approach to respecting human rights through our business activities and relationships. Work on this commitment will continue in FY24.

As a trans-Tasman insurer, we are also keeping across the latest developments in New Zealand and welcome the New Zealand Government's commitment to introducing legislation to support the eradication of modern slavery globally.

Finally, Suncorp acknowledges the recent review of the Commonwealth Modern Slavery Act and looks forward to the Australian Government's response to the resulting recommendations.

Together with our Board and senior leadership team, I remain committed to building on our foundations and continuing to improve our approach to managing modern slavery risk.



Steve Johnston

Group Chief Executive Officer and Managing Director
Suncorp Group

About Suncorp Group

Our business

Suncorp Group offers insurance and banking products and services through a range of brands in Australia and New Zealand.

Suncorp is committed to creating long-term value for all of our stakeholders. We are guided by our purpose – **building futures and protecting what matters** – which positions Suncorp for success over the long term and underpins our future as a sustainable business. Our capable, engaged and diverse workforce brings our purpose to life for our customers and the communities we live and work in.

Our values

Our strong culture is centred around customer obsession and is underpinned by a set of values, behaviours and beliefs. Living by our values every day enables us to deliver on our purpose and strategy.



Doing the right thing

We are customer obsessed and risk aware.



Being courageous

We are performance focused and innovative.



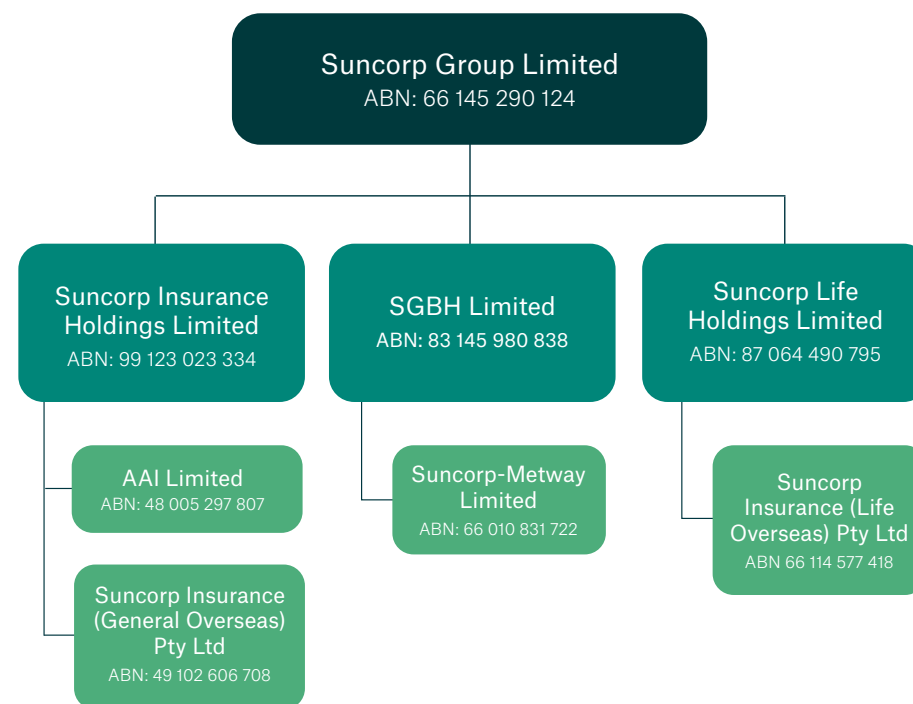
Caring for others

We are inclusive and collaborative.

Reporting entities

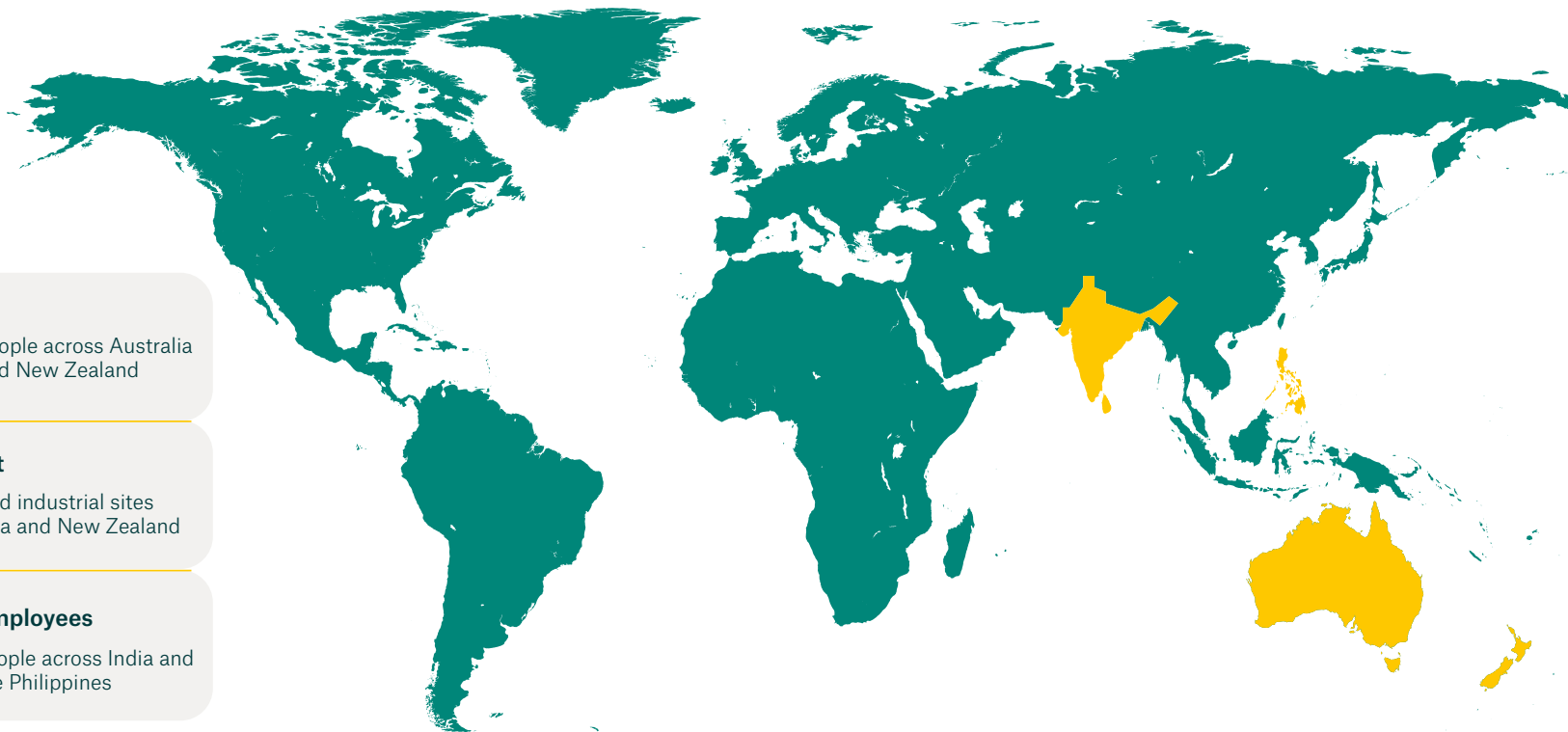
This is a joint Statement covering Suncorp Group Limited (the ultimate holding company in the Suncorp Group) and the below Suncorp Group reporting entities (together referred to as we, our, the Group, Suncorp or the reporting entities), in compliance with the Commonwealth Modern Slavery Act 2018 (the Act).

Other than the eight entities detailed below, no other Suncorp Group controlled entity meets the reporting criteria under the Act. Each of the reporting entities are incorporated in Australia.



Overview of our operations

Suncorp Group Limited is a public company, incorporated in Australia, and is listed on the Australian Stock Exchange (ASX) with approximately \$115 billion in assets. Suncorp Group's headquarters are based in Brisbane, with our registered office located at Level 23, 80 Ann Street Brisbane, Queensland.



- **Direct workforce**

~13,500¹ people across Australia and New Zealand

- **Real estate footprint**

45 commercial and industrial sites across Australia and New Zealand

- **Strategic partner employees**

~3,500² people across India and the Philippines

AUSTRALIA



NEW ZEALAND



1. An approximate number of permanent Suncorp employees (full time, part time, maximum/fixed term and casual) at the end of June 2023
 2. An approximate number of strategic partner employees at the end of June 2023

Our approach to sustainability

Through Suncorp's Corporate Sustainability Principles, we reflect and manage our most material environmental, social and governance (ESG) risks and opportunities to ensure we are a responsible business.

Part of our approach to sustainability is our commitment to support the United Nation's Sustainable Development Goals (SDGs). The Goals call for action to address significant economic, social and environmental challenges such as poverty, inequality, improving health and education and climate action.

We are committed to taking action as detailed through this Statement for SDG 8, which supports the eradication of forced labour.

Sustainable Development Goal

8 DECENT WORK AND ECONOMIC GROWTH



8.7: Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.

Our Corporate Sustainability Principles



Sustainable growth

We seek to innovate and optimise economic, social and environmental outcomes throughout our business and value chain.



Resilient people and communities

We respect human rights and invest in the wellbeing and resilience of our people and communities. We are there for our people and our communities in times of need.



Responsible financial services

We put our customers at the heart of everything we do and help them make good choices. We provide customers with access to affordable financial services that meet their needs.



Trust and transparency

We are committed to building trust and doing the right thing. We are open and transparent in our dealings with our stakeholders.

Understanding our most material topics

Suncorp completes regular materiality assessments to identify what matters most to our stakeholders and our business. This helps us to manage risks and opportunities to create value for our stakeholders, now and in the future.

In FY23, the accessibility and affordability of financial services increased in importance to become our most material topic, followed by climate change response and natural hazard resilience. This reflects economy-wide cost of living increases, as well as a continued societal focus on net-zero transition plans, climate resilience, and event response following natural disasters.

All three material topics have human rights considerations to ensure we are not adversely impacting our people, customers or supply chains.

The assessment also confirmed the growing need for sustainable supply chains following ongoing disruption in global markets, the impact of local skills shortages, and the need for increased due diligence of environmental and social impacts.

Working towards a sustainable supply chain

In FY23, Suncorp began implementing a multi-year Responsible Supply Chain Strategy, which aims to:

- reduce the climate impact of our supply chain
- diversify our suppliers and increase employment opportunities, including among Indigenous Australians
- pay all suppliers on time, and
- reduce the risk of modern slavery.

Suncorp remains committed to responsible supply chain practices aligned to our Climate Change Action Plan, Financial Inclusion Action Plan and our commitment to reconciliation.

Sustainability governance

Suncorp Group Limited (SGL) Board

The Board is ultimately responsible for setting the strategy and risk appetite of the Group, including oversight of existing and emerging risks. This includes approval of our Modern Slavery Statement.

Board Risk Committee (BRC)

The BRC is made up of six members of the SGL Board. The Committee monitors management of existing and emerging risks to the business, including consideration of ESG issues.

Executive Leadership Team (ELT)

The ELT is accountable for delivering the strategic business plan. This includes oversight of the Group's modern slavery program of work, and endorsement of our Modern Slavery Statement.

Group CEO & Managing Director

Responsible for setting the strategic vision for the organisation and ensuring the strategy is implemented. This includes monitoring of existing and emerging risks.

Group Executive People, Culture & Advocacy

Responsible for People and Culture, Corporate and Regulatory Affairs and our Customer Advocate. This includes oversight and review of the Group's modern slavery program of work and our Modern Slavery Statement.

Group Chief Risk Officer

Responsible for leading risk management and compliance across the Group. This includes monitoring existing and emerging risks, such as modern slavery.

Group Executive Technology & Operations

Responsible for technology, real estate, procurement and operational transformation, and partnering. This includes monitoring modern slavery risks in procurement and partnering activities.

Group Chief Financial Officer

Responsible for Group Strategy, Mergers and Acquisitions, Capital, Investments and Performance Management. This includes ownership of the Responsible Investment Policy and having oversight of emerging and existing risks through our investment portfolio.

Group Committee

Sustainability & Diversity Committee

Chaired by the Group CEO and comprised of senior leaders from across the Group. The Committee endorses and receives updates on modern slavery, including progress on commitments, and endorsement of our Modern Slavery Statement.

Business Committee

Modern Slavery Working Group

Includes members from across the Group to discuss and implement the modern slavery program of work. This working group also provides input to our Modern Slavery Statement.

Sustainable Procurement Working Group

Includes members from across the Group responsible for procurement and sustainability. This working group provides updates on implementation of the Responsible Supply Chain Strategy, including embedding modern slavery governance into supplier interactions.

Responsible Investment Committee

Includes members from across the Group including those responsible for investments and those responsible for sustainability. The Committee oversees the implementation of the Responsible Investment Policy and has oversight of the integration of ESG issues into investment processes and practices.

Identifying potential risks of modern slavery

The Commonwealth defines modern slavery as ‘situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom’. The Act specifies eight types of serious exploitation including trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.³

As a provider of financial services in Australia and New Zealand, Suncorp acknowledges our potential exposure to modern slavery. We continue to assess the risk to people, by considering our exposure to high-risk geographies and industries.

The financial services industry is highly regulated in terms of our own operations, particularly regarding the rights of our direct workforce. We are required to complete appropriate due diligence under laws and regulations, such as the Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) laws for our banking operations. We are regulated by the Australian Securities and Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA) and Reserve Bank of New Zealand (RBNZ).

The table provides an overview of how Suncorp could be linked to modern slavery practices based on our understanding of the concepts in the Guidance for Reporting Entities.⁴ This includes how we could potentially cause, contribute to or be directly linked to modern slavery through our operations and supply chains.

Cause modern slavery through our own actions or omissions.	Contribute to modern slavery through our actions or omissions that facilitate or incentivise an entity we engage with to cause modern slavery.	Directly linked to modern slavery through a business relationship with another entity that is causing modern slavery.
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Examples of where Suncorp Group has potential to be linked to modern slavery

<p>→ As an employer through own actions.</p>	<p>→ As a procurer of goods and services through actions that impact our contractors, strategic partner employees and suppliers.</p>	<p>→ As a provider of financial products and services through our insurance and banking customers.</p> <p>→ As an investor through our relationships with investee companies.</p> <p>→ As a procurer of goods and services through our relationships with strategic partners, external investment managers and suppliers.</p>
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3. Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities, Commonwealth Attorney-General's Department, updated May 2023

4. Ibid



As an employer

Our people are a key foundation for bringing our purpose and strategy to life. They are always encouraged to bring their whole, authentic selves to work. Suncorp is committed to promoting diversity and inclusion in the workplace, and to foster equitable opportunities and fair treatment for all employees as outlined in our Diversity and Inclusion Policy.

How we understand and manage potential modern slavery

Suncorp has ~13,500⁵ direct employees located in Australia and New Zealand. Both countries have key legislative requirements for employers that Suncorp adheres to, including:

- **Australia:** Fair Work Act 2009, and various Commonwealth, State and Territory Work, Health and Safety and Anti-Discrimination legislation.
- **New Zealand:** Employment Relations Act 2000 and the Health and Safety at Work Act 2015.

These legislative instruments provide a legal framework governing Australian and New Zealand employment relationships, including the effective enforcement of employment standards. They provide a balanced framework to secure the health and safety of workers and workplaces, including the proactive identification and management of risks to ensure employees are protected against harm to their health, safety and welfare.

Financial services is also a highly regulated industry with minimum standards for skills required to fulfill the roles of our direct workforce. This includes having robust systems and processes in place to ensure that our people are engaged on a proper and lawful basis, along with minimum terms and conditions that apply to all employees.

Suncorp also regularly checks-in with our people through a monthly anonymous survey to gauge employee sentiment and provide a channel for feedback. In FY23 we maintained our employee engagement score in the top quartile with an average score of 8.3.⁶

Suncorp engaged ~900 contractors during FY23, with the majority based in Australia. Contractors are individuals engaged to deliver a defined task, or provide support to manage increase in demand, or volumes, for a short to medium term. The contractors we engage have minimum skill requirements to complete the task and activities required. Contractors' tasks are reliant on their individual skills and expertise, with the employment contracts managed through a third party.

The third parties who hold the employment contracts are required to comply with our Supplier Code of Practice. Suppliers to the Suncorp Group are expected to provide fair working conditions for their employees and maintain acceptable maximum working hours, adequate rest periods, and sufficient leave. As the majority of contractors were Australian based in FY23, these organisations would also need to comply with the Fair Work Act 2009 (Cth.). These processes reduce the risk of modern slavery practices occurring.

Recruitment

Pre-employment and visa checks ensure 'checks of eligibility to work' occur during the recruitment process.

Our recruitment systems have restrictions in place to prevent individuals applying who are under 18 years of age to ensure there is no child labour in our workforce.

Onboarding

Clear expectations are set for our people to comply with Suncorp's Code of Conduct which reinforces our commitment to our values.

The *Suncorp Group Enterprise Agreement 2015* applies to all employees based in Australia (below our Executive General Manager level). This industrial instrument sets out many conditions of employment including working hours, leave and other entitlements.

Employment

Suncorp has governance, oversight and compliance controls in place to ensure our workplaces are safe for our employees.

We also provide a number of confidential avenues to raise concerns regarding their employment through both the Employee Council, which provides confidential workplace relations advice and support, and the Whistleblower process.

5. An approximate number of permanent Suncorp employees (full time, part time, maximum/fixed term and casual) at the end of June 2023

6. Employee engagement is measured by Workday Peakon Employee Voice, a product of Workday, an independent company and a separate entity to Suncorp, and is scored out of 10.0



As a provider of insurance products and services

Suncorp Group offers insurance products across Australia and New Zealand.

In Australia, Suncorp’s insurance brands provide consumer, commercial and personal injury insurance products. Suncorp Group is one of Australia’s largest general insurers by Gross Written Premium (GWP) and the country’s largest compulsory third party (CTP) insurer.

Suncorp New Zealand delivers financial services to New Zealanders through go-to-market general and life insurance products. Suncorp New Zealand, through our Vero Insurance NZ brand, has a joint venture with the New Zealand Automobile Association (NZAA) called AA Insurance, which offers a range of personal and small business insurance products.

Suncorp New Zealand also has a joint venture interest in AA Finance Limited in New Zealand, which provides secured personal loans for vehicles and other needs, such as debt consolidation and home renovation.

The purpose of insurance is to be there for our customers when they need it most. We support our customers through our repair and supplier network across home, motor, commercial and personal injury claims. Our claims fulfilment supply chain is extensive and further details are included on page 16-17.

How we understand and manage potential modern slavery

In FY23, Insurance (Australia) conducted a modern slavery risk assessment as part of our annual ESG Portfolio Review. We analysed our commercial insurance portfolio to understand the exposure to high-risk industries such as construction, agriculture and fishing. Suncorp has identified the high-risk industries from a range of sources including the Global Slavery Index⁷, Global Estimates of Modern Slavery: Forced Labour and Forced Marriage⁸, and Typologies and Indicators of Modern Slavery.⁹

The analysis determined that approximately 14 per cent of the commercial insurance portfolio has exposure to industries deemed high-risk of potential modern slavery practices. The majority of exposure is through our underwriting of the construction industry. We acknowledge the industry is considered high-risk due to the use of labour hire arrangements and the raw materials potentially being imported from high-risk geographies.

Suncorp also provides statutory insurance products such as workers compensation and comprehensive third party (CTP) insurance. Suncorp has no ability to refuse cover to any customer of the relevant schemes across Australia.

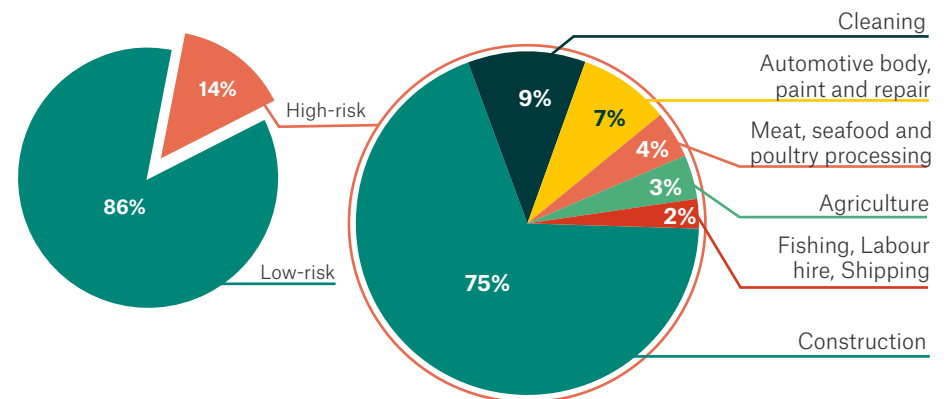
Our Suncorp New Zealand business is working in FY24 to review and collect the correct ANZSIC codes to identify high-risk industries associated with modern slavery.

AA Insurance Limited is classified as a controlled entity of Suncorp Group according to the Act; however, the Group does not have full operational control. Suncorp continued to engage with AA Insurance through our modern slavery working group during FY23.

Both Suncorp New Zealand and AA Insurance have been keeping up to date with the new modern slavery legislation that has been discussed in New Zealand Parliament and will continue to monitor the progress of this to ensure we comply with these legislations when introduced.

Note: On 15 September 2023, Suncorp New Zealand announced the sale of its shares in AA Money to UDC Finance, a specialist loan provider purchasing company.

Australian commercial insurance portfolio % of GWP



7. Walk Free 2023, The Global Slavery Index 2023, Minderoo Foundation

8. Global Estimates of Modern Slavery: Forced Labour and Forced Marriage International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM), Geneva, 2022

9. Typologies and indicators of modern slavery report, Working Paper, Edition 1, March 2022, KPMG, Australian Banking Association



As a provider of banking products and services

Suncorp Bank operates in Australia and is focused on lending, deposit gathering and transaction account services to personal and small and medium enterprise (SME) customers.

We serve our customers through digital channels, contact centres, across 64 bank branches, and our Bank@Post partnership with Australia Post.

How we understand and manage potential modern slavery

In FY23, Suncorp Bank conducted a modern slavery risk assessment as part of our annual ESG Portfolio Review. We analysed the business lending portfolio against listed ANZSIC industry codes included in KPMG's Typologies and Indicators of Modern Slavery, developed in conjunction with the Australian Banking Association (ABA).¹⁰

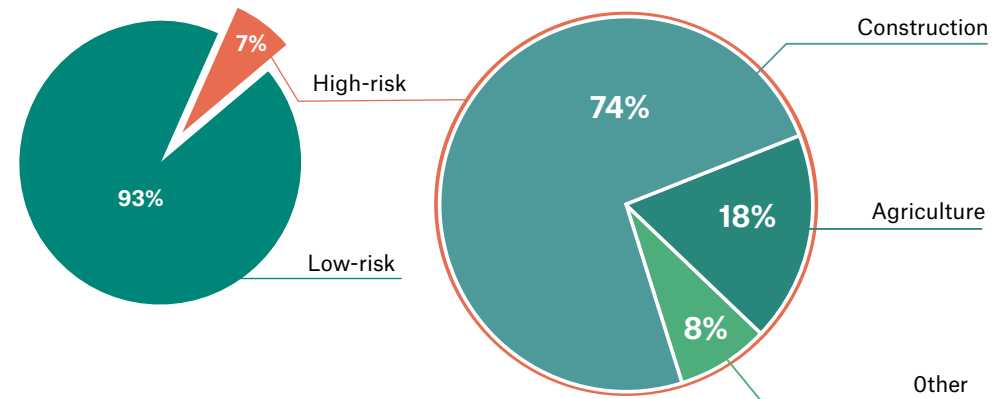
The analysis determined that seven per cent of the Bank's business lending portfolio has exposure to industries deemed high-risk of potential modern slavery practices. This was an increase of two per cent from FY22, which was driven by portfolio growth in the construction industry. We acknowledge the construction industry is considered high-risk due to the use of labour hire arrangements and the raw materials potentially being imported from high-risk geographies. Agriculture is considered high-risk for similar reasons, in addition to it being reliant on a seasonal low-skilled workforce and the payment structure including accommodation deductions.

To manage these risks, all Suncorp Bank employees undergo mandatory training to recognise any unusual behaviour/transactions, and subsequently raise an unusual activity report that is investigated by our AML Operations team. In addition, there are existing transaction monitoring systems and processes to assist in identifying potential cases of modern slavery and labour exploitation. This includes applying additional due diligence if customers related to a transaction monitoring alert are in potential high-risk industries for modern slavery.

Any suspicious matter that results from this investigation is referred to AUSTRAC via a Suspicious Matter Report (SMR). This is part of Suncorp Bank's existing obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act) to report to AUSTRAC any suspicious activity that may be linked to illegal activity.

Note on bank sale: On 18 July 2022, Suncorp Group announced the decision to sell Suncorp Bank to Australia and New Zealand Banking Group (ANZ). On 4 August 2023 the Australian Competition and Consumer Commission (ACCC) published its decision to not approve the sale. Suncorp Group and ANZ have formally applied to the Australian Competition Tribunal for a review of the ACCC's decision. Suncorp Group remains fully committed to Suncorp Bank.

Bank business lending portfolio % of total loans



10. Typologies and indicators of modern slavery report, Working Paper, Edition 1, March 2022, KPMG, Australian Banking Association



As an investor

Suncorp Group has an internal investment manager function, which operates under our wholly owned subsidiary Suncorp Corporate Services Pty Ltd (SCS).

SCS manages the Group's investment portfolio. The team provides specialist investment solutions, including portfolio construction, asset allocation and the establishment and management of agreements with external investment managers (EIMs) across a range of asset classes.

Suncorp has exposure to approximately 1,000 corporate issuers of debt or equity securities across our portfolio. At the end of FY23, Suncorp had \$16,581 million¹¹ in funds under management (FUM).

How we understand and manage potential modern slavery

Suncorp considers successful long-term investing to be consistent with the allocation of capital to enterprises with sustainable business practices. We integrate material ESG factors into investment processes to enable better management of longer-term risk and return. The objective of long-term value creation and the investment decisions contributing to this consider:

- strong governance practices, including transparency and alignment of interest
- strong environmental impact management, including climate change and natural resource scarcity
- strong human capital practices, including labour practices, health and safety, and diversity
- strong human rights standards, and
- strong social impact management, including community engagement practices.

Suncorp maintains exclusion lists focussed on the alignment of our investment portfolios with our Corporate Sustainability Principles and Responsible Investment Policy. We continue to add companies contravening human rights to the exclusion list based on our EIM research and in line with relevant human rights standards and conventions, such as the International Bill of Human Rights. However, Suncorp recognises the need to engage with entities before applying exclusions.

Suncorp engaged 24 EIMs to manage investments on our behalf during FY23, with 15 through direct investment mandates and nine through investment funds. Prior to the selection of an EIM, a risk assessment is performed. Once an EIM is appointed, a contractual obligation including reporting requirements for modern slavery is included and agreed to in Investment Management Agreements (IMA) for direct investment mandates.¹³

During FY23, Suncorp continued to engage with our EIMs regarding their demonstration of the reasonable steps they have taken to monitor and reduce the risk of modern slavery in their operations and supply chains. This engagement included regular operational due diligence reviews, monthly and quarterly compliance reporting and annual attestation requirements. In 2023, eight of Suncorp's EIM published Modern Slavery Statements (six mandates and two funds), sixteen EIMs were below the revenue threshold required to lodge a statement, and each of these (nine mandates and seven funds) satisfactorily completed Suncorp's modern slavery questionnaire and attestation.

~60% of assets invested in Australia.¹²

~15% of assets invested in the United States and the United Kingdom.¹²

The remainder of assets are invested across several countries, all with less than 5% exposure.

11. Figure includes total Australia and New Zealand FUM

12. Includes total Australia Insurance Funds

13. For investments through investment funds which are not legally required to issue a modern slavery statement Suncorp reviews operational practices in this regard and endeavors to establish the requirement via a side letter



As a procurer of goods and services

Suncorp relies on an extensive supply chain to ensure our business can operate and to fulfil claims for our customers.

Suncorp has increased our monitoring of suppliers in FY23 through utilising FRDM, a supply chain risk mitigation software system, to accompany our procurement governance processes.

Supplier agreements are structured depending on the scope of work and risk. The majority of agreements are long-term and stable; however, where required changeable agreements are put in place.

Suncorp continues to be recognised on the Chartered Institute of Procurement and Supply (CIPS) Global Corporate Ethical Register for our commitment to safeguarding against unethical conduct in procurement.

Suncorp remains committed to maintaining a sustainable and responsible supply chain by actively managing ESG risks and opportunities. The standards expected of our suppliers are aligned to Suncorp’s Code of Conduct and detailed in our Supplier Code of Practice, which sets out our expectations with respect to human rights and the provision of safe workplaces for employees.



~\$1.1 billion spent on corporate procurement

~\$2.7 billion spent on claims fulfilment¹⁴



89% of spend with contracted suppliers

11% of spend with non-contracted suppliers

To reduce the risk of Suncorp contributing to modern slavery practices, we regularly perform market analysis and benchmarking to ensure prices are reasonable and appropriate. We also provide suppliers with the opportunity to negotiate contractual terms and conditions where appropriate.

Prior to procuring goods/services

Any engagement over \$500k, related to a technology product or service, or deemed high-risk is managed through our Procurement team to ensure competitive sourcing occurs and the correct contracting requirements are put in place.

Supplier engagements under \$500k or low to medium risk are managed by the function utilising the product/service through a self-service process outlined by Procurement. The process includes a modern slavery risk assessment tool, which considers the commodity type and geography to highlight where further due diligence is required.

Onboarding supplier

Once the evaluation phase of the procurement process is complete, contracts are negotiated with the supplier.

Suncorp’s contract templates contain a modern slavery clause, and during negotiations with a supplier this clause can be reviewed and discussed to ensure the obligations are clear.

Additionally, any expectations of the supplier in relation to their responsibilities are established as part of the contract.

Ongoing governance

Ongoing management of supplier contracts occurs through our vendor management teams and contract owners across the Group. The teams meet with suppliers to discuss the delivery of the goods/services to ensure the supplier is meeting the expectations of the contract. It is also a forum for the supplier to raise any concerns or queries.

Our Supplier Management Framework provides guidance on topics to discuss in the governance meetings with suppliers, of which modern slavery is included.

All contracted suppliers are monitored through FRDM, and modern slavery risk alerts are shared with relevant vendor management teams.

14. Excludes taxes, fees, levies, reinsurance, debt recovery and government regulated services. Excludes non addressable spend categories.



As a procurer of services: strategic partners

Suncorp engages with three organisations to complete business processing services and seven organisations to complete information technology related services. All suppliers have a modern slavery clause in their contract to ensure they take reasonable steps to address the risk of modern slavery in their operations and supply chains.

The ten strategic partners we engage with all submit a Modern Slavery Statement in accordance with the Act.

How we understand and manage potential modern slavery

Suncorp acknowledges that outsourcing is considered a high-risk process as it includes an intermediary party (strategic partner) between Suncorp and the strategic partner employee. This reduces our visibility of the physical workplace, particularly for employees based in India and the Philippines.

To reduce the potential risk of Suncorp contributing to modern slavery, we also ensure agreed workload volumes for the services. For business processing, visibility is provided upfront between Suncorp and the partner of the amount of work to be performed each month, which reduces the risk of excessive hours or overtime being performed.

Adherence to these practices is monitored and governed with regular meetings to discuss workload volumes and progress. The work being completed by our business processing strategic partners requires minimum education, qualification and skill levels for each role.

As per the contractual agreements, our partners are required to proactively escalate issues in line with the agreed escalation matrix. The partners have internal policies for governance, laws, regulations, ethics and integrity, including modern slavery, and they provide confirmation to Suncorp of their compliance. All strategic partner employees performing services for Suncorp are required to complete mandatory compliance training on an annual basis. The partners are required to subscribe to our Supplier Code of Conduct and provide a self-certification on various compliance aspects, including compliance with modern slavery regulations.

The majority of our partners are listed entities on the New York Stock Exchange; as they are global operations. They are required to comply with all applicable local laws and are subject to internal and external audits on an ongoing basis. As they are publicly listed companies, they must also demonstrate adequate measures and controls as part of their obligations to their shareholders.

In FY23, site visits occurred at sites in India and the Philippines to gain additional visibility of the working conditions for our strategic partner employees. Across various site visits to the Offshore Delivery Centres (OCD), 79 Suncorp representatives attended various sites to gain oversight of existing engagements, to conduct commercial deep dives, review the operations and provide training. The site visits did not result in any concerns being raised or action required in relation to modern slavery. In future, Suncorp will continue to periodically perform site visits to our strategic partners to ensure a level of visibility remains over these work sites.



~3,500¹⁵

people employed through our 10 strategic partners



~65%

of employees are based in India



~20%

of employees are based in the Philippines.

The remainder of employees are based in Australia or New Zealand.

15. An approximate number of strategic partner employees at the end of June 2023.



As a procurer of goods: corporate supply chain

Suncorp secures goods to ensure our operations can occur. This includes securing items that have a high-risk of modern slavery according to the Global Slavery Index 2023¹⁶ such as electronics and garments.

During FY23, we have mapped our corporate spend to have a clearer understanding of exposure to high-risk industries.

Of the top five high-risk categories, 82 per cent of spend was on information technology products and services. This included upgrading hardware for our workforce with the rollout of new laptops for our people. This has allowed our workforce to continue to embrace working flexibly with more reliable and up-to-date equipment. Printing, data storage and telephony also contribute to the spend. We acknowledge information technology products are high-risk due to the materials used for the products being sourced from high-risk countries.

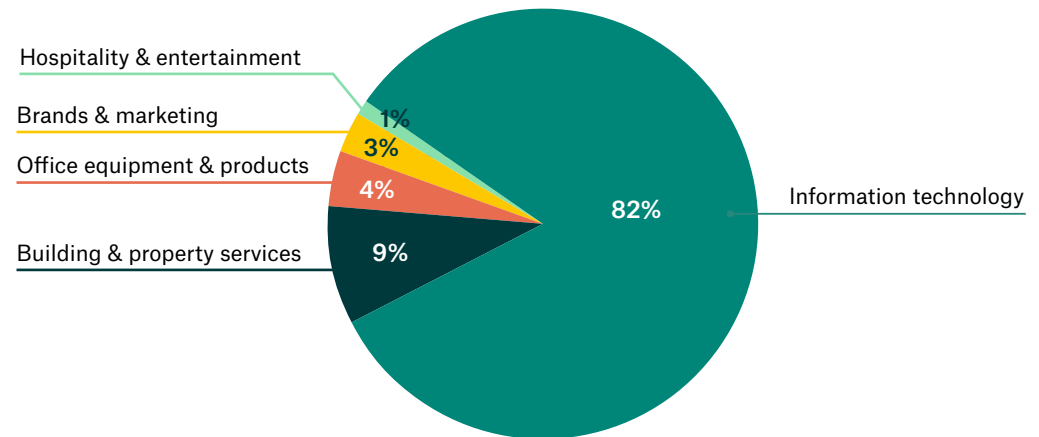
Other areas of our corporate supply chain classified as high-risk are office equipment and products, including stationery and printing services, as well as brand and marketing activities, such as promotion services and corporate uniforms for our bank staff and insurance assessors.

The below five high-risk goods and services represent

9%

of the overall spend in our corporate supply chain.

Spend with potential high-risk categories¹⁷



16. Walk Free 2023, The Global Slavery Index 2023, Minderoo Foundation.
17. Data excludes Managed & Offshore Services and Recruitment & Third Party Labour Hire.



As a procurer of goods and services: claims supply chain

Suncorp Group has preferred supplier panel arrangements in place across our motor, home, commercial and personal injury claims fulfilment supply chain. Our insurance business procures goods and services in line with the Group's Procurement Policy, which provides a guideline for negotiations and contract agreements to be conducted in a way that is sustainable and focused on reducing the risk of modern slavery.

How we understand and manage potential modern slavery



Home claims

Suncorp procures building and construction labour and materials to fulfil our customer home claims. While demand for labour and materials varies across claim types, key areas include restoration services, roofing, carpentry, plastering, painting and electrical.

As part of our home claims panel repairers, we have a wholly owned subsidiary, Home Repair.Net.Au Pty Ltd (HomeRepair), which manages repair fulfilment from assessing the cause of the damage, to preparing scope, to completing the repair.

In FY23, our home claims panel repairers completed modern slavery questionnaires to help us benchmark our supply chain's understanding of modern slavery and the risks in their operations and supply chains. In addition, training was rolled out to internal supplier performance management teams to understand what modern slavery is and how to report any identified risks.

Suncorp's repair panel partners engage both skilled and unskilled labour. For skilled professionals and trades, there are expectations for specific education, skills and licences. This expectation extends to oversight by professionals and licensed trades people of unskilled workers engaged on repair work, for example, support for manual labour tasks, to ensure standards are met.

HomeRepair

HomeRepair, our wholly owned subsidiary, has ~100 employees. Employees are mainly based out of their office in Melbourne, however there are also assessors and other team members based throughout Victoria, New South Wales and Queensland. HomeRepair's contracts with trade suppliers include a modern slavery clause, which includes a requirement for the supplier to notify Suncorp of any incidents.

Typical claims fulfilled by HomeRepair have a simple scope of work and do not involve structural repairs. HomeRepair have a network of assessors, tradespeople and suppliers, many of which have been previously engaged in discussions about modern slavery. HomeRepair has investigated the country of origin for material used throughout the repair process and identified high-risk categories, which include plumbing, flooring and electrical.



Motor claims

Suncorp procures automotive repair parts and labour to fulfil motor claims for our customers.

All Australian-based customers are serviced through Australian-based motor repairers.

Motor claims direct suppliers are based in Australia, with many of these providing goods that originate from other jurisdictions. Our direct suppliers provide goods and services via Suncorp's standard contracting terms, which include a modern slavery clause.

In our motor repair network, we manage compliance of contracting arrangements with all suppliers against our Motor Claims Supplier Performance Framework, which maintains operational risk identification and reporting obligations.

Our publicly linked, strategic suppliers for our Australian motor claims fulfilment include AMA Group, Hertz and O'Brien's Glass. Each of these suppliers provide attestations to ensure compliance with modern slavery contractual agreements.



Personal injury claims

Suncorp procures services for personal injury customers to help our customers back to work and/or health after a workplace or motor vehicle accident injury.

Services are obtained from a broad range of Australian based medical practitioners, allied health professionals, investigation providers and legal practitioners.

Suncorp recognises the importance for our suppliers to meet all regulatory and legislative requirements, while delivering exceptional service to our customers, and the best possible return to work and life outcomes. Where Suncorp has preferred supplier arrangements, risk assessments and due diligence are completed prior to executing contracts, with annual modern slavery attestations completed post contract award.

The highest contracted suppliers sit across legal, medico-legal and rehabilitation services. All providers across these segments are highly skilled and regulated through the Australian Health Practitioner Regulation Agency (AHPRA) or applicable industry body. Medico-legal suppliers are engaged to provide Independent Medico-Legal Examinations (IME), performed by an accredited medical expert. Rehabilitation suppliers work directly with claimants to deliver injury management strategies such as identifying and delivering treatment required to promote optimal recovery.

All services secured for personal injury claimants in Australia, are with Australian-based service providers.

Supplier choice for personal injury claims customers

Although we have preferred supplier panel arrangements, our personal injury claims customers are able to exercise their freedom to choose who they engage with for services, such as medical Specialists and Allied Health services. This means that Suncorp has limited visibility or leverage over suppliers who are chosen by the customer in these circumstances.

In FY23, 30 per cent of our spend with medico-legal professionals and 24 per cent of our spend with rehabilitation professionals was uncontracted.

Taking actions to address risks

During FY23, Suncorp continued to improve our due diligence processes to assess our potential modern slavery risks and to uplift understanding amongst our people. This has included utilising existing governance structures to provide updates on progress to ensure an increase in visibility of Senior Leaders and the Board.

Suncorp has existing remediation and governance structures due to financial industry standards and processes. Further work will be completed in FY24 to ensure existing processes can be accessed and utilised for victims where Suncorp has directly caused or contributed to modern slavery. We will also endeavour to work with organisations who we have a business relationship with.



Maturing our understanding of risk

Suncorp continued to mature our approach to assessing potential risks of modern slavery throughout our operations. We made changes to our internal risk systems to enable capture of potential modern slavery risks in our supply chains and partners. The risk, if assessed as material, is then documented in risk profiles for different areas of our business.

We continued to hold risk assessment workshops with a focus on our insurance functions to uplift understanding of potential modern slavery risks, and to capture any additional work needed to reduce the risk of modern slavery. This will continue across other areas, particularly our New Zealand business, in FY24.

The process improvements will assist with correct identification, reporting, escalation and recording to allow potential systemic issues to be identified and corrective actions put in place to reduce the likelihood of reoccurrence.



New guideline created to support our people

Suncorp created a new Modern Slavery Incident Identification and Resolution Mechanisms Guideline to support our people. The guideline, which accompanies Suncorp's Incident Management Standard, provides an understanding of how a potential incident could be identified, how to review and action next steps, and importantly how to discuss this with our customers, suppliers, strategic partners and investee companies.

The guideline includes the principles for dealing with human rights and modern slavery issues, including that engagement with the organisation that has caused the potential incident of modern slavery to try to remedy the issue and provide resolution.

The process reiterates to our people the need to work with the external party to ensure immediate actions are taken to reduce harm to people and implement steps to reduce the incident from re-occurring. Termination of a relationship or contract should only occur when no agreement can be reached to rectify the situation.



Increasing our understanding of exposure through our supply chain

Suncorp reviewed and updated our internal modern slavery procurement risk assessment tool. The tool is utilised by our people to assess the risk of goods and services. The update included information to ensure considerations of commodity and geography.

We also increased the scope of our supply chain risk monitoring, which now ensures we actively monitor all contracted suppliers through FRDM software. This has increased from the initial 500 suppliers to monitoring approximately 1,300 contracted suppliers through the system.

The data provided to FRDM was reviewed and enhanced to include spend, country and risk categories to enhance the monitoring and alert information we receive.

Our risk and governance

Suncorp has policies, systems, processes and people in place to identify, assess, manage and monitor internal and external risk.

Suncorp's Enterprise Risk Management Framework (ERMF) applies to all of Suncorp, including all of the Group's regulated entities, setting out:

- the minimum standards to manage risks that Suncorp is exposed to as it implements our strategic and business objectives, and
- roles and responsibilities including the Three Lines of Defence Model for risk management accountability.

Everyone at Suncorp has a role to play in relation to risk management, and leaders have specific responsibilities to understand and apply the ERMF as it relates to their area of responsibility.

Risk governance

Accountability for the governance of risk management exists at two levels. Primary accountability rests with the Board, the Board Risk Committee and the Board Audit Committee; the second rests with management, in the execution of the ERMF and application of the Three Lines of Defence Model.

The Group CEO and the Executive Leadership Team oversee risk management through management committees. These include Non-Financial and Financial Risk Committees at the Suncorp Group and function levels. The Group Chief Risk Officer (Group CRO) and function CROs' attendance at Board and management committee meetings are required for committees that monitor and oversee material risks. The CRO and function CRO representatives have authority to challenge decisions and may escalate matters through functional reporting lines and to the Board Risk and Audit Committees.

Three Lines of Defence Model

The Group uses a Three Lines of Defence Model to support our people to understand and manage risk. The model provides clarity of ownership and independent oversight with clear expectations as detailed below.

First line our people

All our people and business areas form the **First Line of Defence** and are responsible for the management of their risks.

The First Line of Defence own their risks and compliance with policies, frameworks, standards and risk appetite.

Second line our risk teams

The Risk function forms the independent **Second Line of Defence** that defines the risk and compliance management approach, policies, frameworks, standards and processes.

They support the business in risk-taking through advice, oversight and effective challenge.

Third line internal and external audit

Internal and External Audit are the **Third Line of Defence** who provide independent reporting to the Board Audit Committee and Board Risk Committee.

Policies and legislation

Suncorp policies

Suncorp has a number of policies in place to manage our ESG risks and opportunities. This allows Suncorp to manage our risks through standards and expectations set for our people and organisations we interact with.

Policy	Description
Sustainable Insurance Policy & Responsible Banking Policy	<p>The policies establish Suncorp’s approach to the management of ESG risks and opportunities across our insurance and bank business. They seek to align our institutional conduct and business practices with positive customer, environmental and social outcomes now and into the future.</p> <p>The policies support Suncorp’s Code of Conduct, Product Management Policy, and other policies that govern how Suncorp engages with its customers and designs and distributes its products and services. They align with Suncorp’s Corporate Sustainability Principles as well as responsibilities to investors via Suncorp’s Responsible Investment Policy, and responsibilities to partners and suppliers via Suncorp’s Procurement Policy, Supplier Code of Practice and Outsourcing Policy.</p>
Supplier Code of Practice	<p>The Supplier Code of Practice details Suncorp’s approach to the standards expected of our suppliers, and their supply chains, when providing goods and services to or on behalf of Suncorp. Suppliers to Suncorp are expected to comply with human rights and fair employment practices in accordance with the International Bill of Human Rights.</p>
Responsible Investment Policy	<p>The Policy sets out how we will ensure the long-term sustainability of investment returns and the management of ESG risks and opportunities in our investment portfolios.</p> <p>Suncorp’s approach to incorporating human rights criteria in its investment decisions is guided by the International Standards on Human Rights. In particular, Suncorp acknowledges the United Nations Guiding Principles on Business and Human Rights, inclusive of the International Bill of Human Rights and other global standards and conventions established by the Organisation for Economic Development (OECD) and the International Labour Organisation (ILO).</p>
Code of Conduct	<p>Suncorp’s Code of Conduct sets the standard for all our people to adhere to. Annual compliance and acceptance of the Code is required by our people. Our Code of Conduct is underpinned by our Being@Suncorp Behaviours — doing the right thing; being courageous and caring for others.</p>
Safety and wellbeing Policy	<p>This policy outlines Suncorp’s commitment to the physical and psychological safety and wellbeing of our people, customers, visitors and external workers in all of our workplaces and interactions. Suncorp recognises that being free of preventable injury or illness and enabling and supporting our people to be their best at work and life, supports our delivery of great outcomes for customers and the communities in which we operate.</p> <p>Suncorp maintains a systematic approach to the management of safety and wellbeing issues and risks that is responsive and consultative in identifying, reviewing and controlling risk. An integrated framework provides instruction, supervision and timely safety and wellbeing information so that our people can do their job safely.</p>
Whistleblower Policy	<p>Suncorp is committed to fostering a culture of honest and ethical behaviour. Core to this is supporting our people to speak up and report any issues to Suncorp. The Whistleblower Policy is designed to provide a channel for our people to speak up confidentially about reportable conduct, as defined in the key terms, if they are not able to raise the issue with their leader or leader once removed for any reason.</p>

Laws and legislation

To comply with Suncorp’s Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) and Sanctions Policy, our procedures include:

- Identification, investigation, escalation and management of relevant customers, assets and transactions.
- Promoting awareness of AML/CTF and sanctions obligations and risks.
- Conducting due diligence including the use of official sanction lists to screen customers, employees, correspondent banks, suppliers, and parties to transactions, where data is available.
- Escalating sanctions breaches to the relevant regulator or law enforcement.
- Submitting a Suspicious Matter Report (SMR) to AUSTRAC.

Law & legislation	Description
AML/CTF	Suncorp Bank must adhere to the AML/CTF laws. Suncorp must perform appropriate scrutiny and monitoring of transactions, account activity and customers, to identify and report matters where there is suspicion that a person is involved in illegal activity or a breach of law. This may include modern slavery and labour exploitation.
Sanctions Policy	<p>Suncorp is required to comply with sanctions imposed by Australia (including both the autonomous and UN sanctions regimes) and New Zealand. Due to its contractual obligations, Suncorp must also comply with the EU, UK and US sanctions regimes in accordance with the Suncorp Group Sanctions Policy.</p> <p>To meet its obligations, Suncorp must take reasonable precautions and exercise due diligence to avoid directly or indirectly dealing with transactions, assets and persons or entities of interest that are on official sanctions lists published by (but not limited to): Australia’s Department of Foreign Affairs and Trade (DFAT); New Zealand’s Ministry of Foreign Affairs and Trade (MFAT); United Nations Security Council (UNSC); United States of America’s Office of Foreign Assets Control (OFAC); United Kingdom’s Office of Financial Sanctions Implementation (OFSI); and the European Union (EU).</p> <p>In addition, Suncorp must also comply with restrictions related to the export (sanctioned supply) and import of sanctioned goods, sanctioned commercial activity and the provision of certain services in relation to a sanctioned supply, sanctioned import and/or sanctioned commercial activity.</p>

Commitments and collaboration



Signatory

Suncorp was a signatory to the following initiatives since 2019 to support the transition to more sustainable and inclusive economies.

United Nations Environment Programme Finance Initiative (UNEP FI), including:

- Principles for Sustainable Insurance (PSI)
- Principles for Responsible Banking (PRB)

Suncorp has also been a signatory of the Principles for Responsible Investment (PRI) since 2019.



Cross-industry collaboration

Suncorp is an active member of key industry bodies and associations relating to the financial services industry. This has included various discussions on modern slavery.

- Insurance Council of Australia
- Insurance Council of New Zealand
- Australian Banking Association
- Responsible Investment Association of Australia

Assessing the effectiveness of our actions

In FY23, Suncorp baselined a number of metrics to assess the effectiveness of our actions over time. We also analysed and reviewed current processes to ensure any improvements required are documented and resourced accordingly.

Educating our people

Metric	FY23 data
Number of employees who have completed the modern slavery online learning module	1,303

During FY23, analysis was completed on the current training module being completed by our employees.

A survey of employees who completed the module revealed:

- 99 per cent of people understood what modern slavery is after completing the training
- 97 per cent of people understood how Suncorp could be potentially exposed to modern slavery risk, and
- 75 per cent of people said they knew how to report a suspected incident.

The insights from the analysis will be used during FY24 to update the module and ensure it is providing our people with the most up-to-date information, as well as ensuring our new guideline on incident response is easily accessible and understood by our people.

In FY24, mandatory training will be investigated to ensure more teams in the Group understand their role in reporting and recognising potential modern slavery incidents. The module will also be updated to ensure it includes specific examples of how Suncorp could potentially cause, contribute to or be directly linked to modern slavery.

Understanding our supply chain

Metric	FY23 data
Acceptance of Supplier Code of Practice for new suppliers onboarded ¹⁸	98%
Acceptance of Supplier Code of Practice for suppliers with spend >\$500K ¹⁸	100%
Coverage of attestations completed by strategic suppliers ¹⁸	79%

In FY23, we completed an attestation process for our contracted suppliers. The attestations provided no material incidents being recorded. However, for suppliers who did not respond, the relevant business areas were engaged to understand the potential risks of modern slavery. Through these discussions, one supplier was engaged further due to insufficient information provided.

In FY24, we will look to simplify the process for attestations to ensure products and services with links to modern slavery can be investigated.

Oversight was undertaken of a sample of supplier risk assessments to evaluate and review if modern slavery risks were being considered when onboarding suppliers. As a result, additional guidance on expectations and an ongoing monitoring program was recommended.

Monitoring responsible investments

Metric	FY23 data
Responsible Investment Policy coverage ¹⁹	97% of total AUM
Number of attestations completed by our EIMs	100%

Suncorp continues to work with our EIMs to integrate ESG risks, including human rights and modern slavery into investment decisions. This includes staying across the latest research and analysis performed by rating agencies.

¹⁸. Excludes New Zealand and Joint Ventures

¹⁹. Investments not covered under Suncorp's Responsible Investment Policy include those in pooled investment vehicles where Suncorp does not direct investment decisions. In such circumstances the governing body (eg Trustee, General Partner et al), EIMs and pooled investment vehicles are assessed prior to investment. Such investments include pooled investment vehicles for unlisted infrastructure and unlisted property.

Progress against FY23 actions

	Commitment	Update
COMPLETED	Refresh the desktop review of Suncorp's contracted suppliers to improve visibility and monitoring of our supply chain.	All contracted suppliers (approximately 1,300) have now been included in FRDM software to improve visibility of risks within the supply chain. Further work is required to enhance the monitoring and reporting process to the business to enable greater oversight.
	Explore external assurance for Suncorp's FY23 Modern Slavery Statement to ensure the ongoing improvement and maturity of our Statements.	External assurance was explored and discussed and the decision was made not to pursue external assurance at this time; however, this decision will continue to be reviewed and evaluated.
	Review Suncorp's current modern slavery training module and measure employee understanding of modern slavery risks for our business.	A review was completed with a plan in place to update the module in FY24 to ensure we are providing our people with relevant and clear information.
	Develop a roadmap outlining Suncorp's approach to managing modern slavery through our external network.	A roadmap was created in FY23 to build on initiatives to be delivered in FY24 and beyond. This includes baselining our suppliers' understanding of modern slavery to inform what further training uplift is required, leveraging industry groups, improving our grievance and remediation processes, and having modern slavery embedded into other ESG initiatives and considerations.
	Develop and implement Board-level risk reporting over modern slavery risks and controls to improve the Board's visibility over the adequacy of the control environment.	Additional reporting was provided to the Board through quarterly risk reporting. The report provided an overview of the control environment and potential risks of modern slavery. This reporting mechanism will continue to be used as required for material modern slavery risks moving forward.
	Define standardised modern slavery incident identification and resolution processes for our people and suppliers.	As previously detailed in this Statement, a guideline has been created to support our people when they witness or are informed of a suspected or actual incident of modern slavery involving our customers, investees or suppliers. The guideline includes key steps and principles to identify and resolve issues.
IN PROGRESS	In New Zealand, review supply chain for potential modern slavery risk and raise awareness of modern slavery risk among suppliers.	<p>We are continuing to increase the understanding of modern slavery risk. Awareness has been increased internally through completion of the modern slavery training module amongst members of the procurement team. An information session was held with our procurement team to enable them to have conversations with suppliers they engage with to raise awareness of potential exposures to modern slavery.</p> <p>Suncorp is also preparing for proposed legislative options to be introduced in New Zealand to help prevent modern slavery and worker exploitation, following consultation undertaken by the Ministry of Business, Innovation and Employment (MBIE) in 2022.</p>

DELAYED

Develop a Human Rights Policy to centralise our commitment to respecting human rights in our business activities.

A roadmap for developing and operationalising a human rights policy/commitment has been completed. This outlines key policy components in line with good practice, and high-level next steps for implementation. Work will continue to progress during FY24.

Future commitments

Suncorp Group is committed to increasing the understanding and visibility of modern slavery risks to our people and suppliers. In FY24, we will continue to progress work on strengthening our processes to ensure we are not causing or contributing to modern slavery.

Key areas of focus moving forward are:

- ➔ Expand modern slavery training to more teams in the Group with a focus on Insurance and New Zealand.
- ➔ Embed our modern slavery incident identification process throughout the Group to ensure our people understand the processes to follow.
- ➔ Continue to work with the Insurance Council of Australia and participate in the ICA Modern Slavery working group.
- ➔ Create a Modern Slavery Standard for the Group to continue to formalise and embed the requirements for our people and the organisation in reducing modern slavery risk in our operations and supply chains.
- ➔ Establish a partnership with Be Slavery Free, to provide further training for our people and to help ensure guidelines and processes are best practice.

Consultation and approval

Consultation process

Suncorp Group as the ultimate reporting entity has prepared this Statement on behalf of the Group.

Each of Suncorp Group's reporting entities, as confirmed on page three, were engaged and consulted directly or through subsidiaries on this Statement.

Representatives from the reporting entities actively participate in the Group's Modern Slavery Working Group, which meets regularly to discuss the Commonwealth Modern Slavery Act 2018 (the Act) reporting requirements, the program of work and how actions, risks and controls are being improved to reduce the risk of the Group causing or contributing to modern slavery.

Suncorp Group engaged Be Slavery Free to review our FY23 Statement and provide guidance.

Statement approval

Suncorp Group's Modern Slavery Statement covering the 2023 Financial Year was approved by the principal governing body of Suncorp Group as defined by the Act on 30 November 2023.

This Statement is signed by a responsible member of Suncorp Group as defined by the Act.



Steve Johnston
Group Chief Executive Officer and Managing Director
Suncorp Group

Statement annexure

The table below provides a reference for the mandatory criteria of the Commonwealth Modern Slavery Act 2018.

Mandatory criteria	Page number
Identify the reporting entity	4
Describe the reporting entity's structure, operations and supply chains	5, 9-17
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities it owns or controls	8-17
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	18-22
Describe how the reporting entity assesses the effectiveness of these actions	23-25
Describe the process of consultation with any entities the reporting entity owns or controls	26
Other relevant information	Statement from Group CEO – page 3 Our approach to sustainability – page 6 Sustainability governance – page 7 Future commitments – page 25 Statement approval – page 26

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