



**HEALTH CLAIMS BUREAU AUSTRALIA**

**MODERN SLAVERY POLICY**

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Health Claims Bureau Australia (HCB) is committed to the principles of the Australian Modern Slavery Act 2018 (Cth), where these apply to HCB Australia, and to upholding the highest standards of ethical conduct and human rights in our operations and supply chains. This policy outlines our commitment to preventing modern slavery and human trafficking in all aspects of our business activities.

## Scope

This policy applies to all employees, contractors, suppliers, and business partners associated with HCB, both domestically and internationally. It encompasses all aspects of our operations, including procurement, processing, partnerships, and supply chains.

## Responsibilities

### Management:

- Management (the Managing Director/MD) is responsible for establishing a culture of zero tolerance towards modern slavery and human trafficking within the organisation.
- The MD must ensure that appropriate policies, procedures, and training programs are in place to identify, prevent, and address instances of modern slavery.
- The MD and management team should provide leadership and resources to support the implementation of this policy and promote transparency and accountability throughout the organization.

### Procurement and Supply Chain:

- HCB is responsible for conducting, where relevant, due diligence on suppliers and business partners to assess their compliance with anti-slavery and human trafficking laws and standards.
- HCB will incorporate contractual provisions and supplier codes of conduct that prohibit modern slavery and require suppliers to uphold ethical labour practices.
- HCB will work collaboratively with suppliers to address any instances of modern slavery identified within the supply chain and support remediation efforts.

### Employees:

- All employees are responsible for familiarising themselves with this policy and understanding their role in preventing modern slavery within the organization and its supply chains.
- They must report any concerns or suspicions of modern slavery to management promptly.
- Employees should participate in training and awareness programs to recognize the signs of modern slavery and understand their responsibilities in upholding ethical labour practices.

## Policy Principles

**Zero Tolerance:** HCB has a zero-tolerance policy towards modern slavery and human trafficking in all forms. We will not knowingly engage in or support any activities that involve modern slavery, forced labour, or human trafficking.

**Due Diligence:** We are committed, where relevant, to conducting due diligence on our operations and supply chains to identify and address risks of modern slavery. This may include assessing the labour practices of suppliers, subcontractors, and business partners and taking appropriate action to mitigate risks.

**Transparency and Accountability:** We will maintain transparency in our operations and supply chains regarding efforts to prevent modern slavery. We will hold ourselves and our suppliers accountable for upholding ethical labour practices and complying with relevant laws and standards.

**Continuous Improvement:** We are committed to continuously improving our policies, procedures, and practices to prevent modern slavery. We will regularly review and update this policy to ensure its effectiveness and alignment with AUSTRALIAN legislative requirements and international best practices.

### **Reporting and Compliance**

Any instances of modern slavery or human trafficking identified within HCB, or its supply chains must be reported immediately to management. Reports will be investigated promptly, and appropriate remedial action will be taken in accordance with applicable laws and regulations.

### **Training and Awareness**

HCB will provide training and awareness programs to employees, and, where deemed relevant, to contractors, and suppliers to educate them about modern slavery, its signs and indicators, and their responsibilities in preventing it. Training will be conducted regularly to ensure that all relevant stakeholders are equipped with the knowledge and tools to address modern slavery effectively.

### **Review and Updates**

This policy will be reviewed annually to ensure its effectiveness and compliance with AUSTRALIAN legislative requirements and international standards. Updates may be made as necessary to reflect changes in laws, regulations, or best practices related to modern slavery and human trafficking