SUNCORP

Human Rights Statement

Human Rights Statement

This statement outlines Suncorp's approach to respecting human rights. While governments have primary responsibility for protecting human rights, Suncorp recognises that businesses have a responsibility to uphold them. Suncorp commits to the following:

- Respecting internationally recognised human rights standards and seeking to mitigate the risk of harm to people through its business activities and relationships.
- Identifying and prioritising salient human rights risks and seeking to integrate human rights considerations into governance, risk management and decision-making.
- Taking action to prevent, mitigate and, where appropriate, remediate adverse impacts it causes or contributes to.
- Providing safe and accessible mechanisms to raise human rights concerns, influencing improved outcomes where it is directly linked to harm, and monitoring and publicly reporting on its progress in line with applicable legislation.

Scope

The Suncorp Group Limited (SGL) Board approves and oversees this Statement for Suncorp Group entities.

The Suncorp New Zealand (SNZ) Boards approve and oversee this Statement for SNZ entities.

This Statement applies to these entities and their Related Bodies Corporate in Australia and New Zealand. This includes all Employees, Officers, and External Workers.

Joint venture partners where Suncorp does not have operational control are excluded.

Where Suncorp relies on third parties on the organisation's behalf, Suncorp expects that these third parties satisfy the requirements of this Statement as it is applicable to them.

Accountabilities

The responsibility for embedding human rights is cross-functional, with oversight and input from the Board Risk Committee (BRC) and the Executive Leadership Team (ELT). A governance structure is in place to escalate and address sustainability risks, including human rights where required.

Our Commitment

Suncorp respects internationally recognised human rights standards as set out in the International Bill of Human Rights and the International Labour Organisation's (ILO) Declaration on the Fundamental Principles and Rights at Work.

In line with the United Nations (UN) Guiding Principles on Business and Human Rights, Suncorp seeks to avoid causing or contributing to adverse human rights impacts through its business activities, and to conduct business in a way that prevents harm and complies with applicable legal and regulatory requirements.

We do not accept the use of child labour or forced labour within our workforce. We are committed to promoting a safe working environment free of unlawful discrimination, and we respect our employees' rights to freedom of association and collective bargaining.

Suncorp will seek to engage with businesses who share its commitment to human rights. Where Suncorp is directly linked to human rights impacts through business relationships, it will seek to use its leverage to mitigate those impacts.

Stakeholder Engagement

Suncorp will engage with internal and external stakeholders to continuously improve its approach and understand its salient human rights issues. Where appropriate, this will include engaging with human rights specialists and directly affected stakeholders or their representatives. Insights from the engagement will inform Suncorp's approach to managing human rights issues, including related strategies and plans.

Suncorp will seek to collaborate through industry forums and working groups to understand common challenges, identify improvement opportunities, and contribute to industry-wide human rights responses where appropriate.

Human Rights Due Diligence

Suncorp seeks to identify, understand, prioritise, and address human rights issues in its operations and supply chain, including in relationships with employees, customers, partners and investee companies.

Identify, Assess and Address

Suncorp prioritises human rights issues based on the severity of harm to people. Through conducting a human rights saliency assessment, the following focus areas were identified:

- Support for customers and communities experiencing vulnerability
- Safety and wellbeing in the workplace, including the management of psychosocial risks
- Protection of customer and employee data and privacy
- Modern slavery and environmental impacts in supply chains and investments

Suncorp will continue to review its salient human rights issues periodically and update this content where required.

Suncorp has the potential to cause, contribute to, or be directly linked to human rights impacts across its operations and supply chain. To mitigate adverse impacts, Suncorp incorporates relevant human rights considerations into risk assessments as appropriate. The results inform ongoing engagement and monitoring activity. In managing its impacts, Suncorp considers its role in the following categories:

Suncorp's role	**Human Rights Focus Area**	**Suncorp's Corresponding Policies**
Employer	Safety and wellbeing in the workplace	Promoting no discrimination: Code of Conduct Promoting diversity and inclusion: Diversity, Equity & Inclusion Policy Promoting fair treatment, the right to freedom of association and collective bargaining: Suncorp Group Enterprise Agreement (AU) and Employment Agreements (NZ) Promoting safety and wellbeing: Safety and Wellbeing Policy
Provider of insurance products and services	Protection of customer and employee data and privacy	Protecting customer privacy and data: Privacy Management Policy
	Support for customers and communities experiencing vulnerability	Providing accessible grievance mechanisms: Complaints Management Policy Protecting customers from financial crime: Financial Crime Prevention Policy Setting expectations for customer interactions: Code of Conduct
Investor	Modern slavery and environmental impacts in investments	Embedding responsible investment practices, including managing ESG risks and opportunities, and setting expectations for Suncorp's external investment managers to consider human rights risks: Responsible Investment Policy
Procurer of goods and services	Modern slavery and environmental impacts in supply chain	Setting expectations for suppliers and their supply chains on human rights, including workplace conditions, safety and wellbeing, and environmental impacts: Supplier Code of Practice (Australia) and Supplier Code of Practice (New Zealand).

Grievance and Remediation

Suncorp offers access to a number of grievance mechanisms, including the Whistleblower Service, allowing a range of stakeholders to raise complaints and provide feedback safely and confidentially. Suncorp aims to enhance the effectiveness of these mechanisms over time.

Suncorp commits to addressing and, where appropriate, remedying adverse human rights impacts caused or contributed to through its business activities. Suncorp seeks to learn from these experiences to improve its approach and mitigate reoccurrence. Suncorp will collaborate with organisations directly linked to it through business relationships to discuss appropriate remedies that are meaningfully informed by the affected rightsholder(s).

Reporting and Transparency

Suncorp recognises the importance of monitoring implementation of these requirements. Suncorp will communicate progress through annual sustainability reporting, or as required through applicable legislated reporting.

Suncorp reports under the Commonwealth Modern Slavery Act (2018) and is committed to continuously improving its annual Modern Slavery Statement. Suncorp will work towards publicly reporting its due diligence processes and the effectiveness of its actions, including mitigation and remediation activities.

Exemptions

No exemptions apply to this Policy.

Breaches

All Policy breaches must be managed in accordance with Suncorp's Incident Management requirements and the relevant Breach Assessment and Reporting requirements (AU and/or NZ), with the Policy Content Owner notified. Deliberate non-compliance with this Policy may result in disciplinary action, including termination of employment.

Key Terms

Term	Definition
Human rights	Fundamental rights and freedoms inherent to all people, which affirm dignity, equality, and freedom and are universally protected without discrimination. Human rights were proclaimed internationally in 1948 by the United Nations General Assembly through the Universal Declaration of Human Rights (UDHR), and legally ratified through binding treaties starting in 1976, with ratification continuing country by country thereafter.
International Bill of Human Rights	The foundational framework comprising the Universal Declaration of Human Rights and the two core UN treaties, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights. Together, these define and protect fundamental human rights worldwide.
United Nations Guiding Principles on Business and Human Rights	A set of internationally endorsed principles adopted by the United Nations Human Rights Council in 2011 that provide the global standard for preventing, addressing and remedying adverse human rights impacts linked to business activities.
International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work	Expression of commitment by governments, employers', and workers' organisations to uphold basic human values vital to social and economic lives. It affirms obligations and commitments such as: – freedom of association and the effective recognition of the right to collective bargaining – the elimination of all forms of forced or compulsory labour – the effective abolition of child labour – the elimination of discrimination in respect of employment and occupation – a safe and healthy working environment
Salient human rights issues	The human rights at risk of the most severe negative impact through a company's activities and business relationships. Where the highest risk of harm to people exists. This concept of salience considers risk to people, while recognising that where the risk to people is greatest, there is strong convergence with risk to the business.
Grievance mechanisms	Process through which grievances concerning business-related human rights abuse can be raised and remedy can be sought.