

Modern Slavery Statement 2019-20

Building futures and protecting what matters



Suncorp Group Limited
ABN 66 145 290 124

About this Statement

This inaugural Modern Slavery Statement covers Suncorp Group's activities over the financial year ending 30 June 2020 and has been prepared to comply with the requirements of the Australian Modern Slavery Act 2018 (Cth).

The reporting entity, Suncorp Group Limited, is a listed company with shares quoted on the Australian Securities Exchange. This statement covers Suncorp Group Limited (the ultimate holding company in the Suncorp Group) and the following Suncorp Group reporting entities (together referred to as we, us, our, Group or Suncorp):

- Suncorp Insurance Holdings Ltd
- AAI Ltd
- Suncorp Insurance Services Limited
- Suncorp Insurance Ventures Pty Ltd
- Suncorp Insurance (General Overseas) Pty Ltd
- SBGH Limited
- Suncorp-Metway Limited
- Suncorp Life Holdings Limited
- Suncorp Insurance (Life Overseas) Pty Ltd.

Other than these ten entities, no other Suncorp Group controlled entity meets the reporting entity criteria under the Modern Slavery Act (Commonwealth) 2018.

This statement has been prepared to meet the mandatory criteria structure as outlined in the Guidance for Reporting Entities: Commonwealth Modern Slavery Act 2018.

Consultation with owned and controlled entities

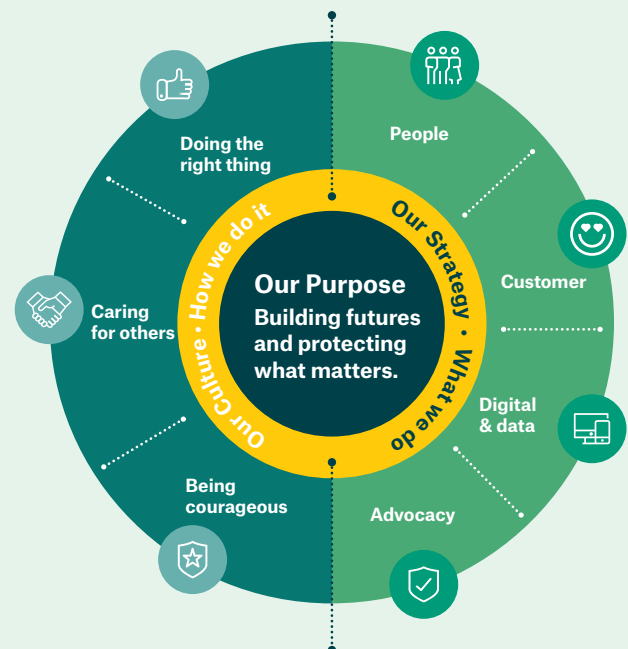
Each of Suncorp Group's reporting entities are involved directly or through subsidiaries in the operations of our banking, insurance or wealth businesses. Each of these businesses has representation on Suncorp's Modern Slavery Working Group and has been involved in the identification, assessment and management of modern slavery risks as outlined in this Statement. Each of the businesses have also been involved in the preparation and approval of this Statement.

Suncorp Group has a joint venture interest in AA Insurance Limited in New Zealand. While it is considered a controlled entity of Suncorp Group for the purposes of the Act, the Group does not have operational control. Consultation began in 2019-20 with AA Insurance in relation to its supply chain and it is our intention to continue consultation in FY21 about identification and mitigation of any modern slavery risks in its operations.

About Suncorp

Since 1902, Suncorp Group Limited has been building futures and protecting what matters. We offer insurance, banking and wealth products and services through some of Australia and New Zealand's most recognised financial brands including Suncorp, AAMI, GIO, Apia, Shannons and Vero, as well as those from our partners. With \$96 billion in assets in 2019-20, we are committed to building a sustainable and responsible financial services group that will help our customers, people, shareholders and communities to prosper.

We're also committed to doing the right thing – it's a principle that's engrained in everything we do, and core to our Code of Conduct.



To read more information about our structure, business and how we operate, please read our **Annual Report**.

Operations

Banking and Wealth

Suncorp's banking business is focused on lending, deposit and transaction account services to personal, small and medium enterprise, commercial and agribusiness customers. The wealth portfolio develops, administers and distributes superannuation products. These products are offered through our network of stores, contact centres, business centres, our brokers network and online.

Suncorp New Zealand

Suncorp New Zealand insurers Vero Insurance New Zealand Limited and Asteron Life Limited underwrite both general insurance and life insurance products, distributed via intermediaries. General insurance and life insurance are also underwritten and white-labelled via corporate partners including ANZ, AMP, DPL Turners and the New Zealand Automobile Association.

Insurance Australia – Product and Portfolio

Under the brands of Suncorp, AAMI, GIO, Vero, Apia, Shannons, CIL, bingle, Terri Scheer, and Essentials by AAI, we offer a range of products including property (residential and business), contents, landlord, motor and business insurances, as well as compulsory third party and workers compensation products. These products are offered direct to customers and through brokers and intermediaries.

Insurance Australia – Claims and Operations

Our Claims and Operations teams have responsibility for all aspects of claims management, operations and insurance projects including claims and non-claims procurement, and Real Estate. A national network of motor and property repairers enables our customers to get back in their homes, businesses and cars after an accident or extreme weather event.

Supply chain:

Fast facts

- More than 1,300 contracted suppliers (2019-2020)
- Over 700 suppliers with a spend of more than \$500,000 per year
- 10 business partners who provide services from offshore locations

Supply chain sectors

- Information, communications and technology
- Property services (including facilities management, utilities, cleaning, waste management and security)
- Business process offshoring
- Logistics and correspondence
- Marketing
- Consulting services
- Print and promotional goods and services (including corporate clothing)
- Office supplies
- Fleet management
- Insurance claims suppliers
- Funds administration and custody (NAS)

Suncorp Group policies

Suncorp policies and supporting documents that include or have been amended to address modern slavery requirements include:

- The **Responsible Banking and Insurance Policy**, and **Responsible Investment Policy** include commitments to regularly assess portfolio-level ESG risks and opportunities, including modern slavery
- Procurement and Outsourcing Policies and guidelines were updated to include provisions relating to modern slavery
- The **Supplier Code of Practice** and clauses in selected supplier agreements in both Australia and New Zealand
- **Suncorp's Code of Conduct** was updated to reference modern slavery and human rights. This code extends to our business partners who interact with others on behalf of Suncorp including agents, brokers and consultants
- The **Anti-Money Laundering and Counter Terrorism Finance (AML/CTF) and Sanctions Policy** states that 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 human trafficking and child exploitation.

Modern Slavery Risks

Suncorp has used data from the 2018 Global Slavery Index (GSI) to help identify the countries, sectors and commodities with the highest risks of modern slavery.

| Category | Commentary |
|--|--|
|  <p>Banking and Insurance, Australia & New Zealand</p> | <p>Suncorp's banking and insurance services predominantly work with Australian and New Zealand customers who are individuals or businesses. International bank transfers that occur to or from our customers in a number of high-risk countries identified in the GSI, are currently monitored through existing transaction monitoring rules for suspicious activity. If potentially suspicious transactions are identified, they will be reported using existing processes. In FY21, we will expand the GSI high risk jurisdictions being monitored and a portfolio level review will be conducted for business lending and insurance with a focus on the agriculture and construction sectors.</p> |
|  <p>Wealth</p> | <p>Suncorp Portfolio Services Limited (SPSL) holds investment management agreements with two external investment managers in addition to Suncorp Corporate Services, namely Morningstar and Asteron Life & Superannuation Limited (ALSL). SPSL's investment management agreement held with Morningstar has been updated to require Morningstar to ensure there is no Modern Slavery in its or its subcontractor's operations or supply chains and provide an annual attestation by 1 April each year. SPSL's Group Investment Policy which is held with ALSL will also be updated to comply with the relevant Modern Slavery Act requirements. SPSL's Environmental, Social and Governance (ESG) Risk Management Policy has ESG considerations integrated in our Investment Manager due diligence, selection and monitoring processes.</p> |
|  <p>Investments</p> | <p>Through its investment portfolios, Suncorp has exposure to approximately 1,000 corporate issuers of debt or equity securities. Some of these issuers operate in higher risk sectors according to the GSI, including mining, garment manufacture, agriculture and construction and geographies including South Africa, Asia and South America. The risk within aggregate investment portfolios is medium. Suncorp employs 15 external investment managers, three transition managers, one overlay manager and a master custodian. The risk of modern slavery in the operations and supply chains of these service providers is assessed as low because of their jurisdiction of operations, regulatory oversight, policy frameworks, and business practices.</p> |
|  <p>Our workforce</p> | <p>Direct employment</p> <p>Most of Suncorp's team members are employed:</p> <ul style="list-style-type: none"> — directly by a Suncorp Group entity — under permanent employment contracts which meet the requirements of the Suncorp Enterprise Agreement and the Fair Work Act 2009 (Cth) in Australia, and in New Zealand, under either an Individual Employment Agreement or Collective Employment Agreement that meet the requirements of the Employment Relations Act 2000, and — subject to eligibility to work and age checking mechanisms during recruitment. |

| Category | Commentary |
|---|--|
|  Our workforce | <p>Labour hire & consulting services</p> <p>Suncorp Group has a long-standing contractual relationship with a managed service provider who hires the majority of our casual and contract workforce across Australia and New Zealand. A small number of professional services suppliers also provide labour to Suncorp in Australia. Both supplier groups have agreements in place which contain provisions intended to mitigate against the risk of modern slavery occurring in their operations and supply chains. These services are managed through commercial contracts that include clauses that require the supplier to comply with the Suncorp Supplier Code of Practice.</p> |
| | <p>Offshore business partners</p> <p>Suncorp has engaged ten business partners, approved by the Board, who are located in the Philippines, India and Australia. Together they employ close to 3,000 employees. All business partners must adhere to Suncorp's policies and frameworks, including the Suncorp Code of Practice which, among other things, requires our partners to ensure that no forced labour, child labour or involuntary labour is used. Using the GSI data, the Philippines and India are rated 30 and 67 (respectively) out of 173 for the highest risk geographies. Contracts with these business partners are subject to benchmark reviews to ensure wages and conditions for team members are at or above market levels. Due to the rigour in place for onboarding and ongoing due diligence of business partners they are deemed low risk by Suncorp.</p> |
|  Supply chain | <div data-bbox="510 1019 1212 1153"> </div> <p>Potential modern slavery risks in our supply chain are assessed and monitored by examining the geography, industry, product and service categories, and maturity of our suppliers' response to risk. Our risks were identified through a desktop review of 200 suppliers who make up 80 per cent of Suncorp's procurement spend, and mapped to the locations of operations for our suppliers and the products and services we use. This high level assessment in Australia mapped the industry, geography and commodity of our supply chain to determine a modern slavery risk profile for Suncorp. Categories of products and services at higher risk for Suncorp include:</p> <ul style="list-style-type: none"> — Technology and electronics: technology provision including electronics, laptops, computers and mobile phones — Facilities management: outsourced real estate requirements, including cleaning and security services — Property, motor and construction: building and repair materials and labour used in property and motor claims businesses — Promotional Goods: this includes items for our brands and purchase of uniforms — Office consumables: such as tea, coffee, sugar and cocoa for our kitchens, and paper. |

Taking action to address the risks

Formal oversight across Suncorp is undertaken by the Board Risk Committee through the Corporate Responsibility Council and the Modern Slavery Working Group. Modern slavery has been included in the 2020-21 Compliance Plan for Suncorp's Responsible Banking and Insurance Policy and Responsible Investment Policy. Oversight of modern slavery considers the adequacy and effectiveness of processes that support the identification, monitoring and management of risks, as well as areas for continuous improvement.

The priority areas for Suncorp in 2019-20 have been our supply chain, investments and our workforce. Actions in these areas are detailed in the following pages.

In 2020, Suncorp was recognised for the second time on the CIPS (Chartered Institute of Procurement and Supply) Global Corporate Ethical Register for our commitment to safeguarding against unethical conduct in procurement.

Governance



Action highlights

- **Expert advice** | Suncorp sought human rights expertise from external consultants to provide advice and guidance on meeting new legislative requirements for 2019-20 reporting.
- **Cross-business working group** | Established June 2018, this group meets monthly to discuss advances in activities to address modern slavery. Attendees include representatives from Suncorp's Risk, Banking, Wealth, Investments, Insurance, People & Culture, Technology & Transformation, Procurement, Contract Managers, Vendor Managers, Outsourcing, Suncorp New Zealand and HomeRepair teams.
- **Education** | Modern slavery training was delivered in person and online for: entire teams in Procurement and Vendor Management; contract owners and leaders in Risk, People & Culture, Outsourcing, Investments, and Claims Supplier Management in Australia; and leaders in People & Partnering, Investments, Claims Suppliers Management and Procurement in New Zealand. Further training, communication and awareness building of modern slavery highlighting Suncorp's obligations, achievements and ambitions was conducted with teams from Risk, Banking and Procurement. Learning programs and resources were made available on the Suncorp learning platform for all Suncorp employees on and offshore.
- **Industry collaboration** | Suncorp has been an active member of the Australian Banking Association's Modern Slavery Working Group and participated in forums with AUSTRAC and Anti-Slavery Australia to develop banking sector guidance on indicators of modern slavery.
- **Advocacy working groups** | Suncorp participates in working groups including the United Nations Global Compact Human Rights Community of Practice and the Sustainalytics-led global thematic engagement program focused on human rights in food supply chains.
- **Risk monitoring** | Suncorp has developed and/or implemented multiple mechanisms to inform us about modern slavery, including:
 - The modern slavery monitoring system, FRDM, provides alerts on key suppliers
 - Multiple screening tools are used across Suncorp to perform monitoring and due diligence
 - Formal governance activities that focus on performance and risk have been implemented within our investments, procurement and offshore partnering
 - A whistleblower service run on behalf of Suncorp by a third party is available to employees and those of our business partners and suppliers in Australia and overseas, providing another channel for people to raise concerns, including in relation to modern slavery.
- **Supplier Commitments** | As a signatory to the Australian Supplier Payment code, we are committed to paying small business suppliers within a 30-day period upon receipt of a valid invoice. This supports our suppliers to relieve cashflow pressures and improves their ability to pay their employees on time and at agreed rates.

Taking action to address the risks: Supply chain

At Suncorp, we see our suppliers and partners as an extension of our brand. We acknowledge that they play a key role in supporting us to identify and eliminate modern slavery from our supply chain.

To mitigate the risks of modern slavery in our supply chain, we've invested in training for our people and put in place mechanisms outlined below to demonstrate we are serious about playing our role in eradicating modern slavery. We will further strengthen oversight in parts of our supply chain where we believe the risk of modern slavery is heightened. We will continue to review our supply chain and include modern slavery on the agenda of relevant governance forums.

Supplier management

Effective supplier risk management across the Group is fundamental in ensuring supplier performance, service reliability and regulatory compliance objectives are realised.

A Supplier Management Framework was launched in 2019-20, setting the minimum standards for supplier performance and risk management following a risk-based approach. This includes modern slavery reporting requirements, labour hire licensing regulations, and payment time reporting. Ongoing forums for vendor management teams across functions are in place to support new requirements and effective delivery.

Across the Group, a forum on Sustainable Procurement commenced in 2019-20 with the objective of incorporating environmental, social and modern slavery risk considerations into procurement processes, and specifically the supplier competitive bid assessment process.

As we mature in 2020-21, Suncorp's Procurement team plans to review third-party risk management practices and tools to enhance management practices and position Suncorp appropriately to address known and future supplier and regulatory requirements. This includes having supply chain risks, including modern slavery, monitored by the Suncorp Board.

Contracts & attestations

We encourage suppliers to work with us to eliminate risk from our supply chain and commit to report breaches. Suncorp has updated contract clauses in strategic supplier agreements and new supplier templates to require them to take the necessary steps to identify, manage, report, and address incidents of modern slavery. Moving forward, modern slavery clauses will be presented in all new and renewed contracts with suppliers. Business partners and selected

strategic suppliers were approached for 2019-20 to include an annual attestation requirement in existing contracts.

Suppliers who provide services under high risk categories were identified, and where appropriate were engaged for further discussion to raise awareness, share strategies for addressing modern slavery in our supply chains, and agree to ongoing actions and dialogue to strengthen our response. Specifically, additional due diligence was conducted with one of the real estate suppliers who provide cleaning and concierge services to our sites to learn how we can best manage the risks of modern slavery in their supply chain. A similar due diligence exercise was completed for a supplier of promotional items.

We also invited a group of strategic suppliers and our business partners to participate in our first annual attestation requirements. Pleasingly, there was a strong response rate and no incidents were identified. In addition, in November 2019, 50 claims suppliers in New Zealand were assessed through a self-assessment survey on human rights to gain feedback on expectations and to help inform future actions. These conversations are valuable, and we will continue to engage with strategic suppliers and aim to increase the number of suppliers who participate in future attestations.

Monitoring & screening

The ongoing monitoring of our suppliers and supply chain is guided by a supplier management framework and function specific governance mechanisms. Third party alert systems and subscriptions are used in desktop risk reviews and support due diligence assessments of strategic suppliers.

Onboarding

Our expectations are set out in our Suncorp Supplier Code of Practice (SSCP), which has been revised to cover modern slavery and human trafficking and abuse of workers. The Code highlights our commitment to human rights, whistleblowing services, and is an extension of the terms and conditions of supply. All new suppliers are presented with the SSCP through the onboarding process.

A Supplier Management Community of Practice is in place to provide knowledge sharing across the business. Our supply chain and categories are being monitored through our risk controls, and industry alerting systems.

View our [Supplier Code of Practice here](#).

Making a commitment to ethical practice

All team members of Group Procurement completed and passed the annual assessment for the Chartered Institute of Procurement and Supply (CIPS) ethics test. The test covers human rights, environmental, procurement fraud, bribery and corruption issues, and enables individuals and businesses to demonstrate their commitment to and understanding of ethical practices in procurement.

Taking action to address the risks: Investments

Suncorp's investment portfolio also considers our risks and our role, in financing potential modern slavery activities. Since implementing our first Responsible Investment Policy in 2017, we've worked with our people and investment managers to help identify and mitigate modern slavery risks in our investment portfolios. We continue to do this through mechanisms outlined below.

Education & training

Our investment team members have been provided with training and learning materials and opportunities to help raise their awareness and understanding of modern slavery risks in investment portfolios. We've engaged our external investment managers with materials and briefings on modern slavery risks and facilitated engagement with investee companies.

Selection & investment

ESG issues are integrated in our Investment Manager due diligence, selection and monitoring processes. Modern slavery clauses were added to the contracts of the 13 Investment Managers with whom we have individual mandates. These

clauses require Investment Managers to provide an annual attestation as to the implementation of their approach and actions taken to reduce modern slavery within their operations and supply chain. Similarly, ESG issues including modern slavery risks are factored into the selection and monitoring processes for other service providers including custody, transition and overlay services.

Suncorp also has investments in a number of collective pooled trusts and is working with the trustees of those entities in relation to modern slavery reporting and disclosures.

Investment Security Selection

Our contracts with external investment managers require managers to actively investigate the presence of forced labour or child labour in the operations or supply chains of investee companies. Additionally, Suncorp has engaged an external research provider to assist in the identification of companies with human rights violations in their operations or supply chains. Companies with identified human rights violations are excluded from our investment universe and not available to external investment managers for inclusion in Suncorp portfolios.

Case study:

Using Sustainalytics to manage the risk

Suncorp has subscribed to Sustainalytics research, which has allowed us to integrate screening for ESG-related risks (including labour and human rights considerations) into the investment decision making process. Sustainalytics also provides investee company risk analysis, which assesses companies on their ability to manage environmental and social risks.

Using Sustainalytics, during 2019-20, we identified a number of organisations with high risks or allegations of modern

slavery within our investment portfolio. Working with our external investment managers, we engaged with those companies with the aim of forming an assessment of the adequacy of the measures in place to avoid human rights violations in their operations or supply chains. We formed the view that six of those companies were not taking sufficient steps to manage modern slavery risk and those companies were excluded from our investable universe. During the year, we noted one of these companies had taken actions to address modern slavery in its supply chain and we have removed this company from our exclusions list.

Taking action to address the risks: Workforce

Suncorp's workforce comprises a mix of directly employed employees, along with a more flexible workforce including independent contractors, labour hire, external secondees, and workers engaged through our partners both within and outside of Australia. We operate across Australia and New Zealand with business partners operating in many countries across the globe. More information is available in our country disclosure [here](#).

Our direct workforce

From the start of the recruitment process through to onboarding, we aim to ensure we act in a way that is not only fair and equitable but eliminates modern slavery risk. We also make sure our expectations are clear – including that every person who works for Suncorp behaves in accordance with our Code of Conduct. Suncorp's Code of Conduct specifically commits to providing fair and favourable working conditions.

During recruitment, we check proof of eligibility to work. In addition, all permanent employees in Australia and New Zealand are paid wages that meet required legislative and agreement terms in both countries, which is at least the current living wage amount.

All new employees must complete onboarding training, including a module on our Code of Conduct. The Code provides that Suncorp will:

- Make it easy and safe for our people to raise concerns as soon as they notice something is not right or could be improved. We do this by immediately reporting any slavery or forced labour

- Provide fair and favourable working conditions to help our people balance their personal and family commitments
- Ask employees to commit to never behaving in a way that's dishonest, illegal, fraudulent, corrupt or unethical.

Our indirect workforce

Our indirect workforce includes people employed by our business partners (predominantly in the Philippines and India), along with people engaged through service suppliers, such as labour hire, concierge team members at our major office buildings and contractors.

Contractual arrangements require Suncorp's service providers to comply with our Supplier Code of Practice and applicable policies and procedures. All personnel engaged by Suncorp by a service provider must also comply with our Code of Conduct and applicable policies and procedures. Contractually, we also include terms to ensure labour providers abide by minimum employment terms and conditions under applicable legislation (including, for example, minimum wages and working conditions).

Suncorp also contractually requires its service providers to conduct their own due diligence of their supply networks to review and assess the risk of modern slavery and applicable controls.

In 2019-20 we started to introduce new terms in our contracts with service providers regarding modern slavery. We closely monitor the performance of these suppliers (for example, where concerns are raised about those companies elsewhere) through our digital monitoring platforms and our contract managers.

The impact of a global pandemic

During the reporting period, Suncorp and our business partners experienced unprecedented business disruption due to the impacts of the COVID-19 global pandemic. We worked closely with our business partners and suppliers – both locally and overseas – to ensure continuity of business delivery in a COVID safe manner, security of employment and maintenance of equivalent pay and conditions for our business partner team members where possible. The safety and wellbeing of their people and our teams continues to be our priority.

Some of our key actions during this period included:

- Continuing to maintain our commitments to our business partners; we have not sought unreasonable contract variations or discounts

- Adjusting our ways of working to allow selected business partners performing critical services in India and the Philippines to work from home (WFH)
- Working with our business partners to ensure the necessary hardware was delivered to the homes of their employees to ensure employment and business continuity. The costs of this WFH setup were shared by Suncorp
- In Australia, Suncorp had hardware delivered to employees to ensure work from home office set up was comparable to the hardware available in our offices. Additional support programs were put in place to ensure employees had access to resources to support their wellbeing.

As the COVID-19 global pandemic continues, Suncorp continues to have regular and close contact with our business partners.

Remediation – receiving & responding to concerns

Giving people a voice

Suncorp has a strong positive risk culture embedded across the organisation and our modern slavery training encourages people to raise concerns, directing them to talk to their leader and risk advisor and follow our incident management process. In addition, our Whistle-blower Policy and confidential Whistle-blower Service is available to all our people and suppliers in Australia, New Zealand and employees of our business partners overseas. By creating a safe space for our people and stakeholders to voice their concerns about modern slavery, we are more likely to be made aware of potential risks and incidents, which enables us to respond quickly and effectively.

During the reporting period our teams continued to improve their knowledge and understanding, and we saw more questions asked about modern slavery risks and potential indicators. More teams across the organisation have sought clarification on clause inclusion, attestation quality and action plans. We have proactively engaged with suppliers to jointly address any concerns.

We want to ensure everyone at Suncorp has a voice, capturing feedback to ensure we have an organisation where we do the right thing for our customers and stakeholders every day. In 2020, Suncorp conducted an Engagement & Culture Survey allowing employees to have their say, which showed our people feel empowered to raise concerns.

To protect our employees and employees of our business partners, we have mechanisms that work to prevent, monitor, identify and escalate poor people practices including our Enterprise Agreements and Remuneration Policy.

Managing complaints & concerns

Feedback, complaints and concerns are a critical component of driving improved outcomes and experiences for our customers and our people. Suncorp has a robust system to receive, review and action complaints or concerns regarding our service, our people and our treatment of customers and employees. Mechanisms include regular performance meetings and interactions with customers, business partners, strategic suppliers and from team members to their leaders. We work collaboratively to understand and resolve complaints and provide visibility and accountability of complaint volumes and themes to all levels of management to ensure our senior leaders understand the issues being raised and how we are responding. This extends to any concerns of modern slavery within our customers or our people.

Assessing the effectiveness of our actions

Suncorp is committed to working to identify and address modern slavery practices if they occur and to building its maturity in this area. We recognise there is more to do to assess the effectiveness of our actions in managing modern slavery risk and will continue to evolve our approach in 2020-21. In our first reporting period we have focused on supply chain, investments and workforce and the actions that have helped us progress in 2019-20 include:

- Established committee structures through our senior leadership teams, creating greater visibility and accountability
- Included modern slavery compliance obligations in our risk system and supply chain risk requirements into our Procurement Framework
- Participated in Non-Government Organisation working groups and sessions including peer discussion and debate that has enhanced our work with the Australian Banking Association's Modern Slavery Working Group, and the UN Global Compact Modern Slavery Community of Practice to understand where we have strengths and our opportunities for improvement
- Sought assistance and guidance from external experts and an Australian not-for-profit Modern Slavery Advocacy Group to assess our approach, and actions.

Future commitments

It is our intention to continue to build our maturity and sophistication in managing the risks of modern slavery to the people that work in or support our business in future years. We have developed a three-year roadmap to help guide our organisation.

Year One: 2019-20

- Operational Policies and Procedures
- Awareness and training
- Procurement and outsourcing
- Investments
- Collaborating with the Banking sector

Year Two: 2020-21

- Portfolio level risk mapping for business lending and insurance
- Enhance transaction monitoring in Banking operations
- Deepening insights in supply chain and increasing the number of suppliers participating in future attestations and conversations regarding modern slavery
- Improving visibility and capability for offshore business partners

Year Three: 2021-22

- Strengthening mitigation and remediation practices
- Perform audit to consider adequacy and effectiveness of addressing modern slavery risk management

This statement is made pursuant to section 13(1) of Modern Slavery Act (Commonwealth) 2018. It constitutes the joint statement of Suncorp Group Limited as outlined on page 3 for the year ended 30 June 2020. This statement has been approved by the Board of Directors of Suncorp Group Limited.



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SUNCORP GROUP CEO
February 2021

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