



ClearView Modern Slavery Statement

11 December 2024

About this Statement

Our Modern Slavery Statement (Statement) is published in accordance with the Modern Slavery Act 2018 (Act)

This Statement is made pursuant to section 14 of the **Act** for the reporting period from 1 July 2023 to 30 June 2024 (the Reporting Period).

This is a joint statement for the following entities:

- **ClearView Wealth Limited** (ABN 83 106 248 248) is a publicly listed company deriving income from the provision of life insurance. ClearView Wealth Limited no longer has a wealth management business. ClearView Wealth Limited is the ultimate parent of the below companies:
 - ClearView Life Assurance Limited (ABN 12 000 021 581); and
 - ClearView Administration Services Pty Ltd (ABN 90 135 601 875).
- **ClearView Life Assurance Limited** (ABN 12 000 021 581) offers life insurance products. This entity is also a subsidiary of ClearView Wealth Limited and meets the reporting requirements of the Act.

The registered address of each of the entities is Level 15, 20 Bond Street Sydney New South Wales 2000. For the purpose of this Statement, ClearView refers to both reporting entities and subsidiaries listed here.

This Statement has been approved and endorsed by

the boards of each of the two reporting entities on 11 December 2024.

ClearView publicly makes available its Statements on its website at clearview.com.au/governance, and it has been shared with its employees via the ClearView intranet. In addition, the Statement has been lodged on the Australian Government's Modern Slavery Statements Register.

Consultation with entities

In preparing the Statement, ClearView consulted with representatives from across its business to confirm actions that have been taken and to establish key areas of future focus for improvements in identifying and managing risks of modern slavery in its operations and supply chain.

Modern Slavery Act mandatory reporting criteria

Criterion	Page reference
Identify the reporting entity.	Page 2
Describe the process of consultation with any entities that the reporting entity owns or controls. In the case of a reporting entity covered by a Statement under section 14 - the entity giving the Statement.	Page 2
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Pages 3 & 6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity. and any entities that the reporting entity owns or controls.	Page 5
Describe the structure, operations and supply chains of the reporting entity.	Page 4 & 5
Describe how the reporting entity assesses the effectiveness of such actions.	Page 7
Any other relevant information.	Page 7

Message from our Managing Director and Chair

Modern slavery is a global issue that calls for greater transparency and business accountability. ClearView has no tolerance for modern slavery linked to its operations or supply chain and we understand our responsibility to manage and eliminate the risks of human trafficking, forced and bonded labour and the worst forms of child labour. Modern slavery disproportionately affects vulnerable communities and people, including children.

We understand that we have a critical role to play in helping Australians when they are at their most vulnerable, and we embrace this ethos in serving our customers every day.”

ClearView has continued to manage its supply chain risks, including modern slavery risk, through its supply chain due diligence process. Following the exit from its Wealth Management business, ClearView is revisiting its broader Corporate Social Responsibility agenda to assess where ClearView can make the most impactful change for the benefit of its customers, partners, people and the community. This includes enhancements to its supply chain due diligence process.

All employees continue to be required to undergo annual mandatory training to maintain awareness of modern slavery risks within our operations.

We remain committed to remediating any identified modern slavery abuses. During the year we did not receive any reports of human rights abuses linked to our business operations and supply chain.



A handwritten signature in black ink, appearing to read 'N Gooderick'.

Nadine Gooderick

Managing Director
ClearView Wealth Limited and
ClearView Life Assurance Limited
11 December 2024



A handwritten signature in black ink, appearing to read 'G Black'.

Geoff Black

Chair
ClearView Wealth Limited and
ClearView Life Assurance Limited
11 December 2024

Further details about ClearView and its business can be found on the ClearView website at clearview.com.au/about

About ClearView

ClearView refers to the ClearView Group, of which ClearView Wealth Limited is the publicly listed non-operating holding company (**NOHC**). Certain entities within ClearView are regulated by the Australian Prudential Regulation Authority under the Life Insurance Act 1995.

Further details about ClearView and its business can be found on the ClearView website at clearview.com.au/about

Life Insurance

The products offered by ClearView Life Assurance Limited are intended to provide financial security to individuals in the event of the unexpected illness, injury or death of an insured person. ClearView Life Assurance Limited manufactures its products under a retail life insurance Australian Financial Services Licence (**AFSL**), licence No. 227682. The ClearView ClearChoice product is only offered to retail customers through financial advisers. ClearView's LifeSolutions product (an advised product) and its legacy direct products are no longer open to new customers.

For further information about our insurance offering, visit our website at clearview.com.au/insurance

Wealth Management

On 31 January 2024, completion of the sale of the funds management business, ClearView Financial Management (**CFML**) to Human Financial Pty Ltd occurred. The Superannuation fund trustee, ClearView Life Nominees (**CLN**) retired as trustee of the ClearView Retirement Plan in December 2023, with the simultaneous appointment of Equity Trustees Superannuation Limited ABN 50 055 641 757 (**ETSL**). ETSL is not part of the ClearView Group.

The completion of these actions has cleared the way for ClearView to now fully exit the wealth management businesses over the coming months.

ClearView Administration Services

Outsourcing and the procurement of most of ClearView's third party service agreements is conducted through ClearView Administration Services Pty Limited. These arrangements include custodial and administration services, software services, internal audit, and other management and administration services. ClearView Administration Services Pty Limited is also ClearView's employing entity.

Modern slavery risk within ClearView operations

ClearView operates within Australia and employs around 300 people, who are mostly based in Sydney and with offices in Melbourne, Brisbane and Perth. ClearView operates one line of business which is life insurance.

ClearView considers its workforce to have a low risk of exposure to human rights abuses because:

- ClearView has set employment standards to meet or exceed the Australian Fair Work Act 2009;
- Our employees are entirely located within Australia; and
- our employees are encouraged to directly report concerns through managers or under ClearView's *Whistleblower Policy*.



Our supplier relationships

ClearView engages a variety of Service Providers for short term procurement contracts and long term outsourcing agreements.

Supply chain overview

ClearView's supply chain is wide ranging but remains typical to the financial services industry with exposures to modern slavery risks resulting from its relationships with suppliers both locally and overseas.

Outsourcing and the procurement of many of ClearView's third party service agreements are conducted through ClearView Administration Service Pty Limited and includes the procurement of products and services across the following categories:

- Claims scanning and software
- Human resources relating to background checks, recruitment, and reference checking
- Logistics, scanning, correspondence
- Office supplies
- Print and marketing including corporate items
- Professional services including audit, consulting, and legal services
- Property services including cleaning, facilities management and utilities
- Travel

Based on the Global Slavery Index (**GSI**) and trends in the financial sector, ClearView believes the following supplier categories to be comparatively higher risk:

- Information and communication hardware – the purchase of devices, such as phones and computers, are considered higher risk due the complex manufacturing process for the products and components. Hardware components are also considered higher risk due to the raw materials and metals used in their production.

- Cleaning and facilities services – an essential workforce that over time has seen an increase in subcontracting and casual contracts.

These trends, in addition to limited oversight and the reliance on a migrant workforce, can increase the chances of wage theft and the denial of workers' entitlements.

Outsourcing arrangements

ClearView has outsourcing arrangements with third party providers who perform business activities on its behalf. Some of these arrangements are considered material in nature including custodial and administration services, software services, internal audit, and other related management services.

ClearView expects its suppliers and outsourcing partners to fully understand and comply with modern slavery requirements. They must proactively identify and mitigate any risks related to modern slavery within their operations

How we manage risk

Code of conduct

- ClearView has a Code of Conduct applicable to all employees, contractors and directors.
- The Code of Conduct sets expectations for how we should act and how we make decisions at ClearView. It shapes how we deliver to our customers, how we work with our partners and stakeholders and how we impact the community we live in. This includes how ClearView manages risks of modern slavery in how it operates and deals with its supply chain.

Risk governance

- The Board and management remain committed to continuously improving the Group's Risk Management Framework to ensure robust risk management practices are in place across ClearView supported by a strong risk culture.
- Whilst these initiatives are not intended to directly address modern slavery risks, they do strengthen ClearView's overarching risk and compliance functions that work with the business to identify and manage all of its financial and non-financial risks.

Modern slavery risk management

- ClearView's ongoing review of its outsourcing relationships is an important part of its modern slavery response.
- When onboarding new suppliers we ask whether they comply with the Modern Slavery Act and request they provide relevant supporting documents, including attestations, reporting or frameworks regarding Modern Slavery.
- As part of ClearView's contract review process, ClearView will take reasonable steps to negotiate anti-modern slavery provisions into all new material or key contractual agreements and any arrangements that may pose a high risk of modern slavery practices.
- As existing outsourcing contracts are renegotiated or actively renewed, we will continue to take reasonable steps to include anti-modern slavery provisions into those arrangements.

Reporting mechanisms

- ClearView extended the protections under its **Whistleblower Policy**.
- "Eligible whistleblowers" is defined to include officers and employees (past and present), contractors, suppliers of goods and services and their employees, and a relative, dependent or spouse of any of these parties.

ClearView promotes a **FairCall Service** to report matters anonymously and confidentially.

The free external hotline and reporting service is independently monitored by KPMG.

Contact

FairCall 1800 500 965
faircall@kpmg.com.au



Assessing effectiveness

We are responsible for continuously improving our processes and we are committed to doing so. During the year ahead, we seek to build on the foundations we have established to assess our effectiveness in identifying and managing modern slavery risks within our business operations and supply chain.

Aspirations for FY2025

Supplier Due Diligence and Management

Continue to evaluate our service provider management process to ensure our contractual arrangements and governance processes address modern slavery risk that can arise in supply chains..