

# Modern Slavery Statement 2025



November 2025



# Introduction

Southern Cross Travel Insurance (SCTI) recognises the important role it plays in protecting the communities in which we operate.

SCTI is committed to upholding human rights and ensuring that all individuals working within our organisation and supply chain are treated with dignity, fairness, and respect. We strive to foster a workplace and supply chain that is free from exploitation, discrimination, and unsafe practices. We explicitly reject all forms of modern slavery, forced labour, and human trafficking.

SCTI's Modern Slavery Statement describes:

- 1. Our structure, operations and supply chain**
- 2. The risks of modern slavery practises in our operations and supply chain**
- 3. The actions taken to assess and address these risks**
- 4. How we assess the effectiveness of these actions.**

We present this Modern Slavery Statement in accordance with the Modern Slavery Act 2018 (Cth).

This statement was approved by SCTI's Board of Directors on 25 November 2025.



**Cassandra Crowley**  
Chairperson



**Anita Hawthorne**  
Interim CEO

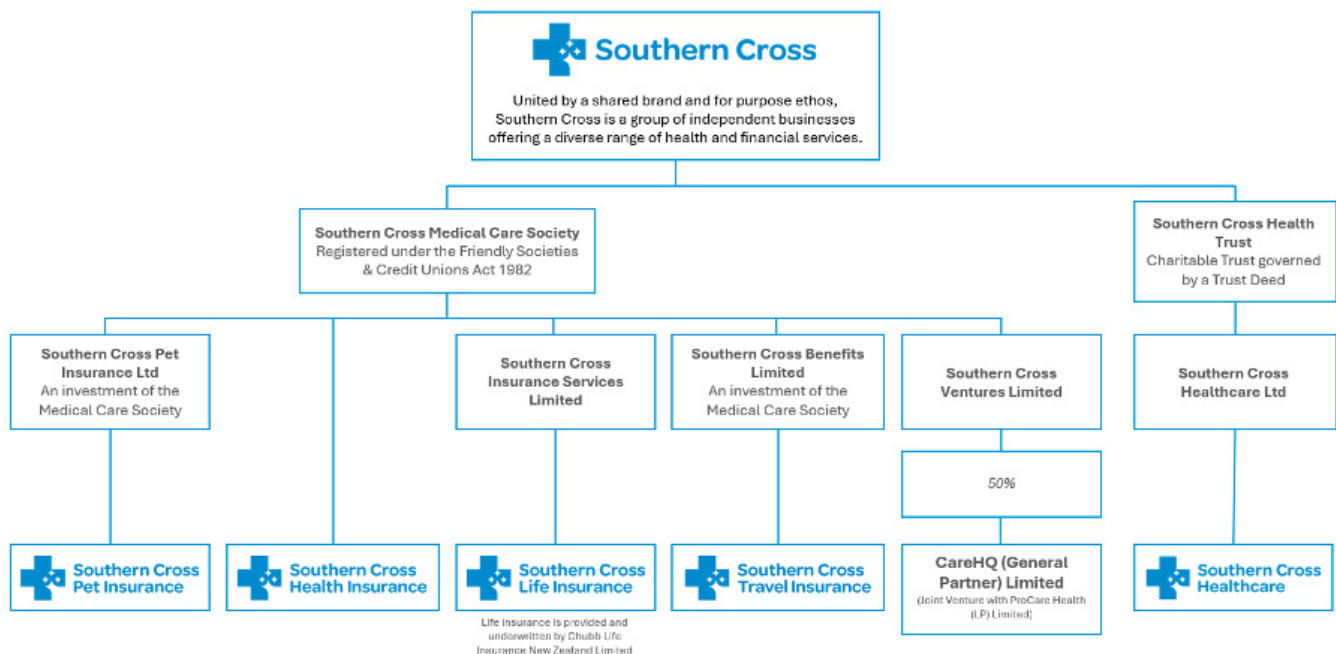
# 1. Our structure, operations and supply chain

## STRUCTURE

Established in New Zealand in 1982, SCTI has over 43 years' experience looking after New Zealand travellers and more than 15 years helping Australian customers travel with confidence, supported by award-winning travel insurance products and service. SCTI is part of the Southern Cross group; one of New Zealand's most enduring and trusted brands.

Southern Cross Benefits Limited (SCBL), trading as SCTI is a general insurance company and a wholly owned subsidiary of the Southern Cross Medical Care Society (SCMCS). SCMCS is registered as a friendly society ("not for profit").

SCTI is licensed to operate in New Zealand and Australia and maintains a branch office in Australia registered by the Australian Prudential Regulation Authority (APRA).



This statement has been prepared solely in relation to the operations and supply chains of SCTI. As SCTI does not own or control any other entities, no consultation with other entities was required under Criterion 6 of the Modern Slavery Act 2018 (Cth).

## OPERATIONS AND SUPPLY CHAIN

With headquarters in Auckland, New Zealand, we operate in both New Zealand and Australia, delivering travel insurance products to customers in both markets. Our business model involves engaging services providers globally across the destinations to which our customers travel. SCTI employs just over 200 employees and contractors. The majority of SCTI's workforce is considered to be skilled or highly skilled personnel.

Business is written and sourced predominantly directly from online channels, with a small percentage via the Sales and Service team, and from a growing cohort of commissioned agents and partners.

SCTI outsources a small number of key processes including emergency assistance, internal audit, Australian branch office management, actuarial services, server hosting and some aspects of technical support.

Our supply chains include:

- Insurance underwriting providers and brokers;
- Technology, communications and software vendors;
- Marketing and advertising agencies;
- Professional services;
- Claims fulfilment providers;
- Banking and investment suppliers; and
- Property services and office supplies.

We engage both domestic and international suppliers across various sectors to support our operations efficiently and ethically. Our supplier relationships are generally long-term and direct, which supports stronger oversight. Technology services involve a mix of direct and indirect arrangements, adding complexity to risk assessment in some cases.

## 2. Modern slavery risks

We acknowledge the potential presence of modern slavery within our business activities as a financial institution. We have assessed the risks of modern slavery practises in our operations and supply chain which can be grouped under the following themes.

Theme	Modern slavery risk area
<b>Insurance Services</b>	<ul style="list-style-type: none"> <li>• Underwriting activities</li> <li>• Claims processes and fulfilment including emergency assistance</li> <li>• Product design and use</li> <li>• Vulnerable customer care.</li> </ul>
<b>Investing</b>	<ul style="list-style-type: none"> <li>• Investment brokers, direct investment or companies within investment funds.</li> </ul>
<b>Distribution Partners</b>	<ul style="list-style-type: none"> <li>• Businesses and education providers we partner with distribute our insurance products.</li> </ul>
<b>Organisation</b>	<ul style="list-style-type: none"> <li>• Buying goods and services if our suppliers or their sub-contractors engage in these crimes</li> <li>• Engagement of employees.</li> </ul>
<b>Corporate citizen</b>	<ul style="list-style-type: none"> <li>• Through our sponsorship programme and charitable donations.</li> </ul>
<b>Customer</b>	<ul style="list-style-type: none"> <li>• Through cash claim settlements which may then be used to support modern slavery practises.</li> </ul>

Through our people management policies and practises, we explicitly reject all forms of modern slavery, forced labour, and human trafficking. We ensure that:

- All compensation practises highlight our commitment to meet or exceed the level where our people can live well and legal minimum wage standards reflect fair remuneration for work performed.
- Employment terms are freely agreed upon, with no coercion, deception, or withholding of wages or documents.
- Transparency and accountability are embedded in our reward systems, ensuring ethical treatment and equal opportunity for all employees. This includes a salary banding system, industry benchmarking and annual review.
- Regular reviews are conducted to identify improvement in processes and mitigate risks of exploitative labour practices within our operations.

This statement reflects our broader commitment to ethical labour standards and responsible business conduct housed within our Code of Conduct Policy and employment agreements. We expect all employees, contractors, and suppliers to uphold these principles and report any concerns through our confidential grievance channels. Mandatory training is provided on onboarding and refreshers required regularly.

SCTI has a strong risk culture with frameworks and systems that support our work to protect the human rights of our community and uphold our key value of putting our customers first.

We analysed our supply chains and operations to identify modern slavery related risks, using a risk rating criteria based on the Australian Government's recommended processes. The risk of modern slavery within our direct operations is assessed to be lower than within our supply chain. This assessment reflects the nature of our services, the geographic regions in which we operate, and the professional expertise of our employees and contractors.

Our emergency assistance outsourced provider has been identified as our key modern slavery risk area. This provider has an extensive global network of medical professionals and repatriation experts with some providing services in high-risk geographies. Where higher modern slavery risks are identified, we apply enhanced due diligence as appropriate.

### 3. Actions taken to address modern slavery risks

During the reporting period, SCTI has undertaken the following steps to address modern slavery risks:

- Initiated a formal project to enhance the governance and operational oversight of modern slavery risk and ensure regulatory compliance.
- Uplifted procurement processes including supplier screening and due diligence requirements to incorporate modern slavery risk management.
- Conducted risk assessments to identify potential vulnerabilities in our operations and supply chains.
- Engaged in direct collaboration and auditing of high-risk suppliers to ensure transparency and compliance.
- Developed a programme to enhance contractual arrangements including employment agreements to include specific provisions against modern slavery.
- Incorporated modern slavery considerations in training and awareness programmes to employees.
- Performed a comprehensive review of our policies and procedures to ensure guard rails are in place for the management of modern slavery risk.
- Reviewed our people management and customer lifecycles to identify improvement opportunities for the management of modern slavery risk.

These actions reflect our commitment to eradicating modern slavery and promoting ethical practices throughout our operations. SCTI is dedicated to continuous improvement in its approach to combating modern slavery and has an ongoing programme to manage modern slavery risk.

## 4. How we assess the effectiveness of these actions

SCTI formally documents our approach to managing obligations in our compliance management policy and operationalises this through our obligations register housed in our risk management system. Regular management assessments reinforce awareness and compliance with Modern Slavery requirements.

In alignment with our risk management framework, we conduct periodic internal audits and implement risk and control assurance activities across our control environment, of which Modern Slavery is included. We are also undertaking an audit of applicable suppliers to assess compliance with Modern Slavery requirements. We remain committed to strengthening the maturity of our risk and control environment, particularly in identifying and mitigating potential Modern Slavery risks within our supply chain operations. Assessing the effectiveness of our actions to address modern slavery risks is an area of ongoing development and we remain focused to continuous improvement in this area using our regular review process.

## Contact information

For further information regarding this statement, please contact Southern Cross Travel Insurance on **+61 1800 196 484**.

