

Modern Slavery Statement

2022-23



Introduction

NTI Limited (NTI) ABN 84 000 746 109, AFSL 237246, is the manager of the National Transport Insurance Joint Venture*, a leading supplier of specialised insurance products to the transport and logistics industry.

NTI aims to uphold high moral, ethical and sustainable business practices, including those related to Modern Slavery and human rights. NTI rejects any form of Modern Slavery and respects the human rights of our employees, clients and those of our suppliers and business partners.

This statement covers the activities of NTI to understand and implement actions to minimise the risk of Modern Slavery and human trafficking in our operations and supply chain.

NTI does not own or control any reporting entity and there are no entities with whom NTI is issuing a joint Modern Slavery statement.

This statement covers the activities of NTI Limited as the reporting entity and its subsidiary Logistics Safety Solutions Pty Ltd (LSS) ABN 25 134 417 379, during the year ended 30 June 2023. The term 'NTI' used in this statement, refers collectively to NTI Limited and its subsidiary LSS. LSS is the only entity that NTI Limited owns or controls.

* Insurance products are provided by National Transport Insurance, a joint venture of the insurers Insurance Australia Limited trading as CGU Insurance ABN 11 000 016 722 AFSL 227681 and AAI Limited trading as Vero Insurance ABN 48 005 297 807 AFSL 230859 each holding a 50% share. National Transport Insurance is administered on behalf of the insurers by its manager NTI Limited ABN 84 000 746 109 AFSL 237246.

The Company

NTI provides specialist insurance and roadside assistance solutions primarily to business customers. NTI serves over 30,000 businesses across Australia specialising in transport, construction, marine, logistics and deliveries. NTI's purpose statement is "We make you safe and more sustainable".

NTI proactively participates and contributes to the community. We are focused on understanding our customers, the industries they work in, their issues and pain points and look for new ways to help on emerging issues including wellness and a positive approach to mental health through events, sponsorship and education. These include regular panel discussions on a number of unique factors across transport and logistics and what can be proactively done to support these challenges.

We continue to work closely with Australia's pre-eminent transport, construction and logistics Associations to improve road and operator safety and each year we leverage years of detailed data capture to pinpoint opportunities for future improvement with the release of the Annual NTI Accident Investigation Report. We aim to always be a trusted partner within our industry and have deep connections with our suppliers across Manufacturers, Repair and Towing.

NTI is committed to continually improving our company, systems and processes and ensuring our focus and expertise provides outstanding products, services and partnerships that deliver value.

We focus on maintaining an ethical culture that inspires, nurtures talent and positively contributes to the community.

Consultation

During the reporting period this statement covers, NTI actively engaged and consulted with LSS in the development of this statement. Engagement includes a representative from LSS on the NTI Modern Slavery Group. We discussed the reporting requirements of the Modern Slavery Act 2018 (Cth); information regarding the actions we intend to take to address these requirements and provided LSS with relevant materials and updates.

Our Operations

The majority of NTI's workforce is located in Australia. NTI's head office is located in Brisbane with a regional office in each state. NTI employs approximately 480 people nationally.

NTI's employees are predominantly covered by Common Law contracts or employed under independent contractor arrangements. NTI has a dedicated Service Centre team based in-house in Australia providing 24/7 support for our customers. NTI also contracts approximately 63 overseas claims, administration and LSS support team members in Manila, the Philippines via a third party Australian based specialist provider.

We strive to be an equal opportunity employer in all locations and are committed to ensuring that our employment conditions meet minimum wages, appropriate hours of work and leave provisions. We take the health and wellbeing of our team members seriously and regularly go beyond the requirements of WH&S legislation.

As part of induction all team members are required to undertake Code of Conduct training which details our ethical approach to our business and our people. This extends to include details of our Whistleblowing Policy.

NTI's operations are made up of the core functions of product design, distribution and claims management supported by People and Culture, Finance and Governance and Information Technology.

Our combination of tailored products, experienced people, leading repair and recovery networks, and industry advocacy have seen us ranked as Australia's number one specialist insurance provider.

Our range of products and services goes beyond traditional insurance. We are committed to delivering on our purpose: "We make you safer and more sustainable". NTI actively invest in the sustainability of our customers' businesses by providing risk management and leadership solutions that help them actively manage their businesses.

We partner with risk management specialists, technology providers, and industry authorities to help customers and partners confront today's challenges. While this initiative originated through work within the transport industry, we are actively pursuing it across all of our specialised industries.

Our insurance market operations include 5 customer brands.

NTI's subsidiary, LSS, is an Australian-founded business that provides a Chain of Responsibility (CoR) compliance management system to transport consignors.



From single vehicles to large fleets, we offer flexible, tailored solutions to cover vehicles with a carrying capacity of 3.5 tonnes and over. With local experts across Australia we understand the challenges our customers face - especially after an accident.

Our claims process has been designed in consultation with the transport industry. Moreover, we have an internal team of dangerous goods incident management experts across the country.



Yellow Cover protects plant and equipment operators across Australia, from owner-operators right through to the biggest names in the industry.

Yellow Cover provides customers with industry-leading products, access to NTI's award-winning claims solution, a lifetime guarantee on authorised repairs and a team of experts and recovery operators all over Australia.



Truck Assist provides roadside assistance 24/7, 365 days a year via a national network of over 4,000 trusted service partners. We have wholesale agreements with a large number of truck manufacturers in Australia and, currently, a Truck Assist roadside program covers every second new truck sold in Australia.

Truck Assist has also grown to offer an online insurance product specifically designed to meet the needs of truck owners and operators in Australia. The Drive Pack product provides comprehensive Motor Cover, Downtime Cover, and an inclusive truck breakdown service.



Marine Protect is one of Australia's leading marine insurance specialists. Our suite of products offers tailored and customisable coverage for owners and transporters of cargo, as well as vessel and marine business operators.



Shipping and Delivery provides cover for goods accidentally lost or damaged during an insured single transit within Australia, whether it's carried by road, rail, boat or air.

Our Supply Chain

Our core supply chain includes brokers, transport associations, other strategic distribution partners, truck manufacturers and dealerships, parts suppliers, repairers, and specialist tow operators for trucks.

We have developed specific roles within the organisation to manage relationships with both our Repair network, non authorised repairers and Original Equipment Manufacturers (OEM). We work closely with our repairer networks to ensure that they meet relevant industry codes and respective state licensing requirements, particularly in respect to the safe and environmentally safe disposal of waste and by-products. Annual reviews are conducted with each OEM and NTI's Repair Networks including reviewing contractual agreements and explicit consideration of Modern Slavery requirements in these "Hotspot" suppliers. We stay close to OEMs to ensure we fully understand their purchase and importing arrangements and any challenges they face.

We continue to remain close to Transport Associations by way of sitting on Boards and a variety of working groups. This ensures we have an intimate understanding of industry challenges and issues.

Further detail on our supply chain is included in the table included in the below section, "Identifying risks in our operations and supply chain".

Understanding our Modern Slavery Risk

NTI's Modern Slavery Statement applies to and describes the steps taken by NTI to minimise the risk of Modern Slavery occurring on our business and supply chain and builds on the initial assessment in 2020.

NTI's statement reflects our ongoing management of Modern Slavery risks across our supply chains and operations.

Identifying Risks in Our Operations and Supply Chain

NTI's issue identification process has identified four potential Modern Slavery "hotspots" and inherent risks in both our operations and supply chain:

Operations	Supply Chain
Insurance Support Services	Claims Services Repair & Assistance
Business Relationships	Procurement of Goods not for Resale (GNFR) and Corporate Services

The issues identified continue to provide NTI with a basis for Modern Slavery risk assessment of both operations and supply chain and helps to prioritise our focus across our operations and supply chain.

Risk Assessments for All Modern Slavery Hotspots

Potential Hotspot	Issues Descriptions	Potential Risks
Insurance Support Services	<ul style="list-style-type: none"> • Service Centre • Overseas claims, administration and Logistics Safety Solutions support (circa 63 team members) • Local surveyors and ad hoc labour needs 	<p>NTI's presence in the Asia-Pacific region potentially exposes the company to a heightened Modern Slavery risk. This is a potential hotspot due to:</p> <ul style="list-style-type: none"> • The need for enhanced proactivity in respect of visibility over procedures to ensure compliance with local laws and International human rights frameworks and standards. • The need for enhanced proactivity in respect of recruitment, workforce/ contractor management and remuneration practices. <p>Offshore:</p> <p>Work is provided to NTI via a specialist Australian based agency. NTI has significant transparency over arrangements, which includes direct contact with employees, employee feedback and pay reviews and transparency over employee remuneration.</p> <p>Employment practices include age checks, reasonable working hours 9:00am to 5:00pm, Monday – Friday and award rate for their role and location with the same benefits and rewards offered to Australian NTI employees extended to offshore employee.</p> <p>Employees have access to all policies that onshore employees have including the NTI Whistle-blower policy and all Employee Assistance Program (EAP) services.</p> <p>Onshore:</p> <p>NTI has a dedicated Service Centre team based in-house in Australia.</p> <p>Due diligence Contracts, age checks, salary reviews, Australian Citizen/right to work in Australia checks are completed across all Service Centre employees.</p>
Business Relationships	<ul style="list-style-type: none"> • Partnerships with big brands • Due diligences on large insurance clients 	<p>High risk categories:</p> <p>Sourcing of goods and materials (e.g. batteries, tyres, windshields) through partners requires enhanced proactivity over the recruitment, workforce/ contractor management, visa management and remuneration practices of the goods manufacturer.</p> <p>Modern Slavery clauses are being included in new contracts and existing contracts upon renewal.</p> <p>For large business partners a review of Modern Slavery statements is completed as well as online review of the company to determine for any red flags. If found, this is further investigated and action determined by senior management.</p>

Risk Assessments for All Modern Slavery Hotspots

Potential Hotspot	Issues Descriptions	Potential Risks
Claims Services Repair & Assistance	Independent contractors for smash repairs, roadside assistance and towing	<p>High risk business models</p> <p><i>Contracting and sub-contracting:</i></p> <p>These practices create multiple layers between NTI and the workforce.</p> <p>NTI have a repairer network and predominately use this network of trusted repairers.</p> <p>As part of the repairer's network, Modern Slavery is initiated into new contracts and existing contracts upon renewal.</p> <p>The use of contractors and subcontractors may also overlap with vulnerable populations including base-skill workers. Vulnerable populations could be from migrant, low socio-economic or culturally or linguistically diverse backgrounds, and are particularly vulnerable to systemic issues such as underpayment, withholding of wages, and excessive working hours.</p> <p>High risk geographies</p> <p>Whilst it is a common assumption that Modern Slavery is inherently low-risk in a developed nation such as Australia, the location of NTI suppliers in regional/rural domestic locations potentially exposes the company to heightened Modern Slavery risk due to reduced visibility of these workforces and labour practices. Regional/rural populations may experience increased vulnerability to Modern Slavery due to several factors including:</p> <ul style="list-style-type: none"> • Reduced ability to leave their situation • Lack of alternative employment opportunities or employment at a small/ family-run business, which reduces agency to negotiate employment conditions such as working hours, remuneration and other entitlements. <p>Contractors are high-skilled workers and considered a minimal risk of Modern Slavery.</p>
GNFR & Corporate Services	Procurement of goods and services integral to NTI's operations.	<p>High risk categories</p> <p>Base-skill roles such as cleaning, maintenance and security require closer monitoring to help ensure workers are not underpaid or exploited.</p>

Actions Taken to Assess and Address Risks 2022-23

- Our approach to Modern Slavery is underpinned by our Modern Slavery Framework which includes senior leaders from key functional areas including People and Capability, Claims Services, Procurement and Compliance. This framework is reviewed annually with no changes in the reporting period.
- In the reporting period NTI formed an Environment, Social and Governance (ESG) committee to review the already many things we do that make a difference socially (such as combatting modern slavery) and environmentally in order to develop a strategic roadmap. During this start-up phase NTI became a signatory to the Insurance Council of Australia (ICA) climate roadmap to achieve net zero emissions for scope one and two by 2030. KPMG were contracted to measure our carbon footprint via Baseline Audits for our Scope 1 and Scope 2 emissions. This was delivered in March 2023 and is being utilised to inform our future strategies.

The Scope of the ESG Committee includes Ethical Supply Chains, Employment Standards and Health and Safety considerations which are relevant to Modern Slavery considerations.

- We continue to identify any impacts in which we operate with the following actions:
 - Strengthened and improved our operational practices through structured frameworks including a formal ongoing training program to support the business.
 - Continued to implement policy and procedures covering our responsibilities to combat Modern Slavery
 - Knowledge is provided through NTI's internal intranet which hosts the framework to support Modern Slavery and the business in which we operate.
 - Self-Assessment procedures and templates to assess Modern Slavery risks in our supply chain.
 - Annual Review undertaken with each business function across third party supplier arrangements. This functional review confirmed the ongoing contractual requirements on third party suppliers which are reinforced verbally for higher risk suppliers.

- In the current reporting period NTI have assessed our Australian-based suppliers through our annual contract engagement review process. This includes reviewing individual supplier contracts, Modern Slavery requirements and supplier Modern Slavery statements.
- Dedicated Modern Slavery representatives across our business operations. This group is responsible for managing Modern Slavery risk in their functional areas.
- Supplier contracts continue to be updated to include clauses that require partners to take all reasonable steps to ensure that there is no Modern Slavery in the service provider's operations or supply chains.
- Work in Manila (circa 63 team members) is provided to NTI via an Australian-based agency. NTI has significant transparency over arrangements, which includes direct contact with employees, employee feedback and pay reviews and transparency over employee remuneration.
- Information and Technology primarily source software and hardware needs from large suppliers. Due diligence checks involving checks on Modern Slavery Statements has identified that the vast majority of large business partners having existing Modern Slavery Statements.
- The vast majority of general parts are sourced from Original Equipment Manufacturers. Due diligence checks are completed including review of recently published Modern Slavery Statements.
- Repairs are undertaken via NTI's Authorised Repairer Network and to be a part of the network the repairer is subjected to due diligence checks (including Modern Slavery). Modern Slavery & Human Rights clauses are also included on all new contracts as well as in any renewals on existing older contracts.
- NTI's Human Rights policy is reviewed annually. There have been no changes in the reporting period.

Assessing the Effectiveness of Our Actions

NTI has a Risk Management Framework and Risk Appetite Statement which governs the management of risks across the business. The actions and risks identified above have been integrated into NTI's Risk Management Framework and appropriate mitigating actions developed.

Accountability and capability building will be important for NTI and will provide a solid foundation for enhancing existing systems and controls to incorporate explicit consideration of Modern Slavery risks.

Overall, extending NTI's existing policies, systems and processes will support the implementation of a number of steps to increase maturity in subsequent years.

Looking Forward

NTI is committed to continuously improve its approach to managing Modern Slavery risk and we will continue to evolve our approaches.

Approvals

This statement was approved by the Board of Directors of NTI Limited, in its capacity as the principal governing body of NTI Limited, on 8th December 2023.

The statement is signed by Paul Smeaton in his role as the Chairman of NTI Limited on 8th December 2023.



Paul Smeaton
Chairman