Modern Slavery Statement

2025

Contents

Acknowledgement

Adica acknowledges Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of the lands on which we live and work across Australia. We pay our respect to First Nations Elders past and present. As a business with a national presence, we acknowledge and respect the cultural heritage, beliefs, and enduring connection to the land that remain significant to the Traditional Custodians today.

1. CEO's Statement

At Adica Insurance, we are committed to supporting a safe, ethical and sustainable insurance ecosystem. As our business continues to evolve, we recognise our responsibility to identify and prevent modern slavery risks within our operations and supply chain.

We maintain a stringent risk management framework and Modern Slavery Policy, underpinned by accountability, ethical practice and responsible leadership. In FY25, we further strengthened our Environmental, Social and Governance (ESG) approach, with a particular focus on responsible supplier management, enhanced governance and supplier oversight.

Through active supplier engagement and the continued progression of modern slavery risk assessments, we are building a more data-driven understanding of risks and opportunities for improvement. Adica Insurance remains committed to upholding human rights and driving continuous improvement across our operations and supply chain.

I am proud to present Adica's Modern Slavery Statement for the financial year ending 30 December 2025 (FY25), prepared in accordance with the Modern Slavery Act 2018 (Cth). This statement covers the activities of Aioi Nissay Dowa Insurance Company Australia (Adica) ABN 11 132 524 282 as the reporting entity.

Dean Cullen
CEO & Managing Director

FY25 Highlights

Risk Analysis Completed risk assessments for 62 new suppliers and strengthened oversight by reviewing existing assessments to identify higher-risk suppliers.

For more information, see section 9 2025 Risk Analysis of our statement.

Updated Governance Frameworks We implemented a new Service Provider Management Policy and commenced an update to our Procurement Policy.

For more information, see section 10.1 Annual review of risk and governance frameworks section of our statement.

Overall Risk Position Confirmed an overall low-to-medium modern slavery risk profile, with a slight increase driven by higher-value engagements associated with the technology transformation program.

For more information, see section 9 2025 Risk Analysis of our statement.

2. About Adica

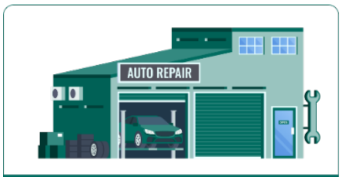
Aioi Nissay Dowa Insurance Company Australia Pty Ltd (Adica) ABN 11 132 524 282 is an Australian–operated and regulated general insurance company.

As a key member of the global Japanese insurance leader MS&AD, we take great pride in our strong heritage as a multi-award-winning motor insurer with roots dating back to 1897. Our commitment remains steadfast: to deliver exceptional products, services, and value to our customers and to Toyota, at every step of regardless of their journey.

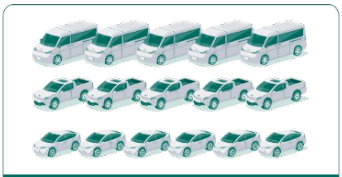
We are equally proud to uphold the values of our global parent, which is a signatory to the UN Global Compact and has a strong commitment to human rights, including preventing human rights abuses within value and supply chains.

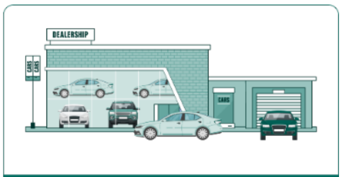
Adica's strength in the Australian market is underpinned by specialisation and expertise in retail automotive insurance. Leveraging this deep industry knowledge, we partner with our business collaborators to help transform the insurance value chain for customers.

We are focused on serving the Australian market in three key insurance sectors:



RETAIL MOTOR


FLEET MOTOR



DEALER HOUSE ACCOUNTS

Our Award Winning Company

At Adica, we take pride in our commitment to our customers, our people, and excellence in industry leadership. This dedication has not gone unnoticed, and we're proud of the recognition we've earned along the way.

ANZIIF 21ST AUSTRALIAN INSURANCE INDUSTRY AWARDS 2025 WINNER

Small-Medium General Insurance Company of the Year 2025

HR AWARDS 2025

Australian HR Awards 2025 Finalist

Small-Medium General Insurance Company of the Year 2024

THE AUSTRALIAN BUSINESS AWARDS EMPLOYER OF CHOICE WINNER 2024

Employer of Choice Award 2024

Family Inclusive Workplace CERTIFIED

Certified Family Inclusive Workplace

Small-Medium General Insurance Company of the Year 2021-2023

3. Our Values

Our values define and guide our decisions and shape our interactions with each other, our customers, our distributors and our community. The Adica five core values serve as the foundation for the behaviours expected from all Adica employees. When employees consistently align their actions with Adica's values, it strengthens our ability to operate effectively and meet our strategic objectives.

1. **Customer** – we think customer.
2. **Innovation** – we lead the way.
3. **Professionalism** – we are experts in what we deliver
4. **Teamwork** – together we make a difference.
5. **Integrity** – we do the right thing

These values are integral to the way we do business. They are there as a reference point if you're ever unsure about a decision. If you are working with these values as your guidelines, you will have the support and confidence of Adica behind you.

Our Commitment

We are committed to preventing acts of modern slavery from occurring within our operations and supply chains.

We maintain a stringent risk management framework and a Modern Slavery Policy to ensure that we facilitate a collaborative and safe workplace for our employees and workers in our supply chains.

4. Our Brand Partners

We insure over 220,000 Australians and small businesses through various business partner brands including:

LEXUS INSURANCE

TOYOTA Insurance

TOYOTA FLEET MANAGEMENT

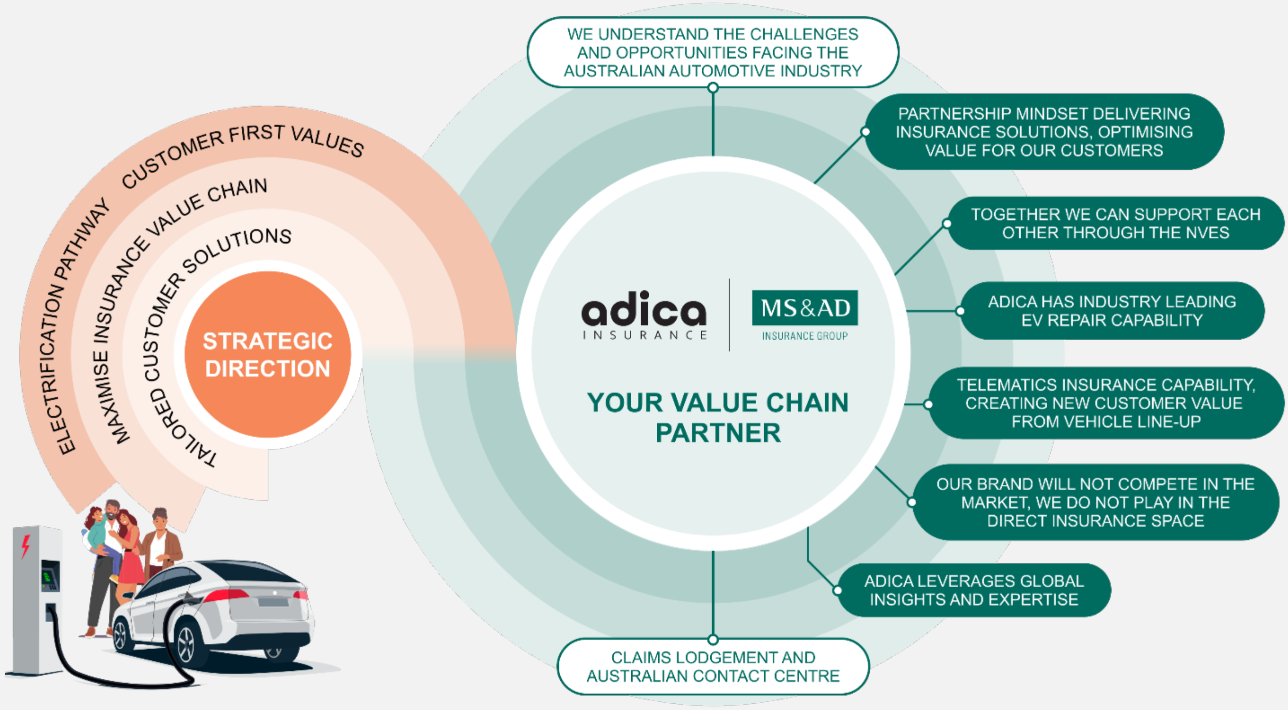
PowerTorque Insurance

paywise salary packaging

CLOVER INSURANCE

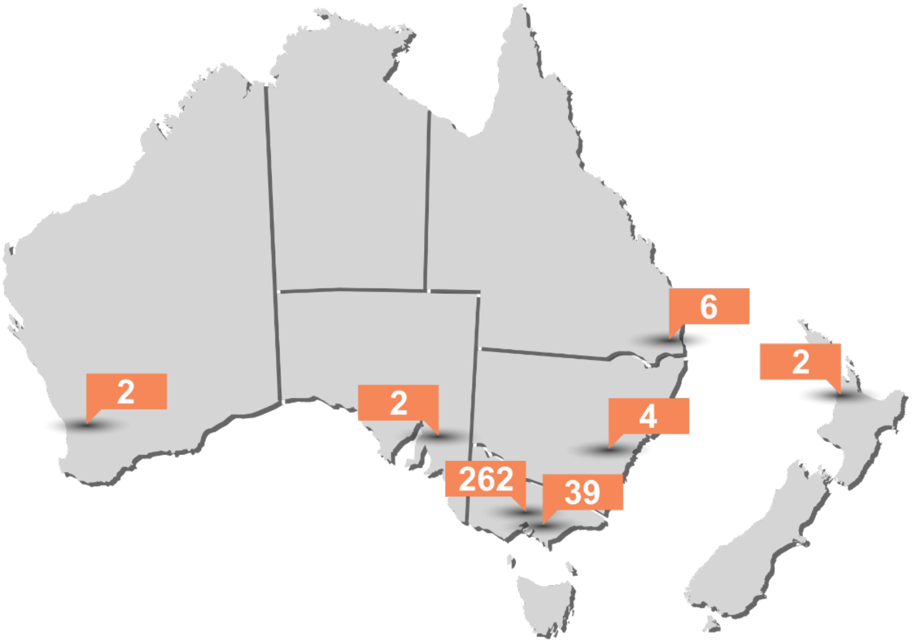
360 Underwriting Solutions

We also provide commercial fleet and industrial special risk insurance to hundreds of small to large businesses, where we insure over $18.3 billion in business assets.



5. Our People

We employ approximately 283 full-time, part-time, fixed-term and casual employees throughout Australia and secondee team members to our business from our business partners. We also contract a limited number of team members in the Philippines and India via Australian-based companies.



Our main business functions include Claims & Service and Product Design, supported by Human Resources, Finance, Risk, Governance & Legal, Strategy & Partnerships, Project Management and Technology.

Creating a safe, inclusive, and respectful workplace is a shared responsibility and fundamental to our organisation's success. At Adica, we are committed to fostering an environment where people feel respected, supported, and empowered to perform at their best.

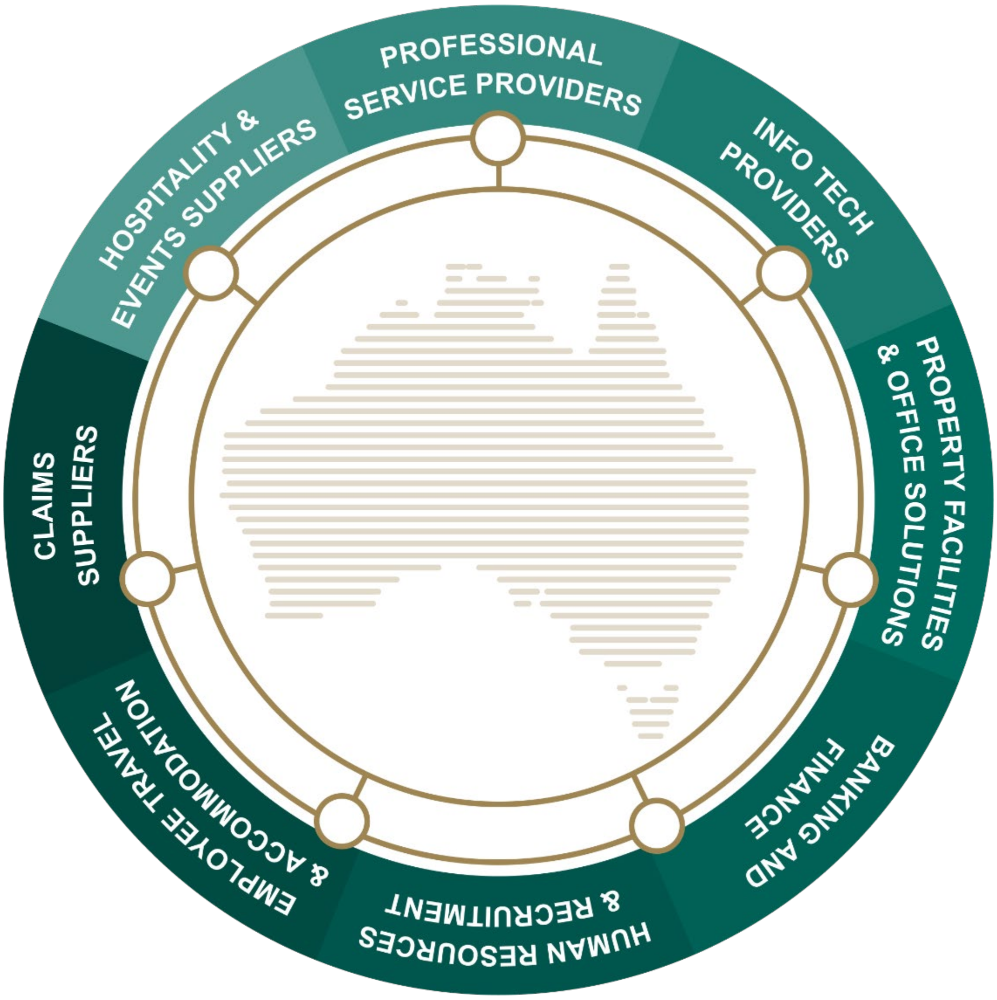
Our Code of Conduct defines the values, ethical principles, and standards that guide our behaviour. It outlines the expectations placed on all employees and provides a clear framework for understanding our responsibilities and obligations in the course of our work.

Our workplace culture is shaped by how we act, make decisions, and engage with others. Our Code articulates the behaviours we expect in our day-to-day activities and in our interactions with colleagues, customers, distributors, and the wider community.

6. Our Supply Chain

We engage suppliers to assist with the delivery of our products and for services.

These suppliers are typically located in Australia and include the following:



7. Our Structure

The Board of Directors- Risk and Compliance Committee

The Board of Directors has overall responsibility for setting the risk appetite and strategy for Adica and ensures Adica complies with its legal and ethical obligations. The varied experiences and skills of our board members are crucial for shaping and evaluating our strategy, annual operational plans, and budgets. They also play a vital role in ensuring proper audit functions and legal compliance. Their practical, up-to-date industry experience is essential to our success. The Board is responsible for approving the Modern Slavery Statement and Policy.

Executive Leadership Team

Adica Insurance has seven functions and is led and managed by the CEO & Managing Director. The Executive Leadership Team deliver the business plan and has overall responsibility for managing business operations and risk management and other governance frameworks.

Senior Leadership Group

The Senior Leadership group have primary day-to-day responsibility for managing risk and operations and remain alert to indicators of modern slavery.

Visit **adica.com.au/about/board-and-management/**
to read more on our corporate management structure.

8. Supplier Modern Slavery Assessment

Pursuant to our Third-Party Oversight Policy[1], Service Provider Management Policy[2] and embedded within our procurement process, we conduct modern slavery due diligence on all prospective and new suppliers. For existing suppliers, we undertake ongoing monitoring to ensure that required standards continue to be met, in line with Service Provider Management Policy. This includes periodic review of suppliers' modern slavery risks and, where applicable, annual reviews of suppliers' modern slavery statements.

Our Procurement Policy requires suppliers with a procurement value exceeding $500 to complete a modern slavery risk assessment. Information collected through this process is used to conduct an initial modern slavery risk analysis which considers the supplier's overall risk profile across the following factors:

INDUSTRY RISK

Whether the supplier operates in sectors with higher inherent modern slavery risk due to industry

REGION RISK

Whether the supplier operates in countries or regions associated with higher modern slavery risk due to factors such as conflict, weak rule of law or limited regulatory oversight.

DOLLAR VALUE RISK

The significance and value of the supplier relationship and its potential impact on our operations

In addition, we consider a range of other contextual factors, including the supplier's governance arrangements, use of sub-contractors, cost of the arrangement, and screening against global sanctions and regulatory enforcement lists.

Where the initial risk analysis identifies potential modern slavery risks outside our risk appetite, we undertake a further assessment to determine the supplier's risk rating (high, medium or low) and which informs appropriate risk management actions.

---

[1] Third-Party Oversight Policy ceased on 30/06/2025
[2] Service Provider Management Policy commenced on 01/07/2025

9. 2025 Risk Analysis

Over the Reporting Period:

- We completed risk assessments for 62 new suppliers and;
- We reviewed and analysed risk assessments to identify higher-risk suppliers.

These suppliers primarily include information technology providers supporting our technology transformation project, as well as hospitality and events providers and human resources such as recruiters and workforce contractors.

Our 2025 risk analysis concluded that these suppliers and their respective supply chains present a low to medium level of modern slavery risk. While our overall risk profile has slightly increased compared to prior years, this is largely attributable to the commencement of a significant technology transformation project, where the higher value of engagements carries an elevated dollar value risk.

Risk Analysis

Service Supplier	Low	Medium	High
Professional Service Providers			
Information Technology Providers			
Property facilities management and office solutions			
Banking and finance			
Human resources such as recruiters			
Hospitality and events providers			
Employee travel and accommodation			
Claims suppliers			

In 2025, no complaints were received in relation to modern slavery risks within our supply chain.

10. Our Responsibility & Actions Taken to Detect and Combat Modern Slavery Risks

We are committed to preventing acts of modern slavery within our operations and supply chains. Should concerns or allegations arise regarding a supplier, we will engage with relevant stakeholders to ensure the matter is addressed promptly, fairly and with appropriate diligence. We will thoroughly investigate all complaints.

Where issues are identified, we will review our relationship with the supplier and take appropriate action, which may include implementing remediation measures, requiring corrective actions or, where necessary, termination of the relationship. Our approach seeks to support effective remediation while upholding our zero-stance on modern slavery.

As an Australian Prudential Regulation Authority (APRA) regulated entity, we maintain strong risk management and governance frameworks which support us in managing modern slavery risk. In addition to our Service Provider Management Policy and Procurement Policy we also have a Modern Slavery Policy and undertake the following safeguards:

- Annual reviews of our risk and governance frameworks; and
- Ongoing employee training, education and protections.

These examples are discussed in detail below.

10.1 Annual review of risk and governance frameworks

We have a strong suite of risk and governance frameworks that assist us to maintain a strong risk culture. Our risk and governance department, along with other accountable business units, annually review our corporate policies and processes to ensure they effectively protect us from a variety of risks. This includes our modern slavery policy, Service Provider Management Policy and Procurement Policy.

In 2025, our third-party oversight policy ceased and was replaced by our Service Provider Management Policy to align with the expectations set out in APRA prudential standard CPS230. A review of our Procurement Policy also commenced in 2025, and this has now been finalised.

Our Service Provider Management Policy applies to all Adica employees and contractors and requires us to conduct thorough due diligence and background checks on potential and existing suppliers in accordance with our Modern Slavery Policy.

We also promote a “speak up” culture, which enables our employees to feel comfortable to raise issues and concerns across all areas (including modern slavery risks).

The MS&AD group is committed to Human Rights, and we developed a Human Rights Policy, designed to promote a work environment that upholds and respects the fundamental principles of human rights. It outlines the responsibilities of Adica as an organisation within the MS&AD group with respect to both community and social responsibility, as well as the responsibility of our employees to ensure compliance with human rights laws. When creating our Human Rights Policy, we considered the Act and our commitments made in our modern slavery statement.

10.2 Our employees

To protect our employees against modern slavery risks we:

- Require all employees to undertake annual modern slavery training;
- Conduct regular work health and safety checks including on-premises and home office; and
- Conduct annual reviews to assess remuneration against changes in the market and applicable legislation.

We encourage our employees to report any genuine concerns about modern slavery within our operations or supply chains.

11. Assessing the Effectiveness of Our Actions

Following our annual review of modern slavery risk management processes, we are satisfied that our current identification and mitigation measures remain appropriate and effective, considering our business size and the complexity of our operations. These measures are underpinned by our robust corporate governance arrangements and ongoing employee training, reinforcing our commitment to minimising modern slavery risks. Notably, during 2025, no significant increase in modern slavery risk was identified across our supply chain.

12. Future Actions to be Undertaken

We remain committed to continuing to develop our modern slavery program, raising awareness with our employees and working close with our partners, industry, suppliers and government bodies to continue to raise the awareness of modern slavery risks.

We acknowledge that on 30 January 2026, the office of the Australian Anti-Slavery Commission released a position paper for consultation with stakeholders, that responds to, and builds, on two key reform measures under consideration of the federal government. These include, a mandatory risk based modern slavery due diligence obligations for reporting entities and a mechanism for the Australian Anti-Slavery Commissioner to declare that a product, service or industry carries a high inherent risk of modern slavery, which require entities to have regard to declarations in their due diligence and reporting obligations under the Act. In 2026, we will follow updates to the Modern Slavery Act, including relevant consultations.

In 2026 we will also undertake the following actions:

- Review our modern slavery and governance frameworks to ensure they remain effective is managing and addressing modern slavery risks;
- Continue to take a risk-based approach when considering suppliers who carry a higher inherent modern slavery risk rating, to ensure that due diligence undertaken is relevant to the risk; and
- Review our current modern slavery risk management practices in line with the consultation findings arising from the current public consultations.

This statement was approved by the Board of Directors of Adica and signed by John Richardson in his role as Chairman of the Board on 26 May 2026.

John Richardson – Chairman

[1] https://www.ag.gov.au/crime/publications/australian-government-response-review-report-modern-slavery-act-2018-cth

AIOI NISSAY DOWA INSURANCE COMPANY AUSTRALIA PTY LTD (ADICA)

ABN: 11 132 524 282

LEVEL 17, 412 ST KILDA ROAD, MELBOURNE, VIC 3004

PO BOX 7212, MELBOURNE, VIC 3004