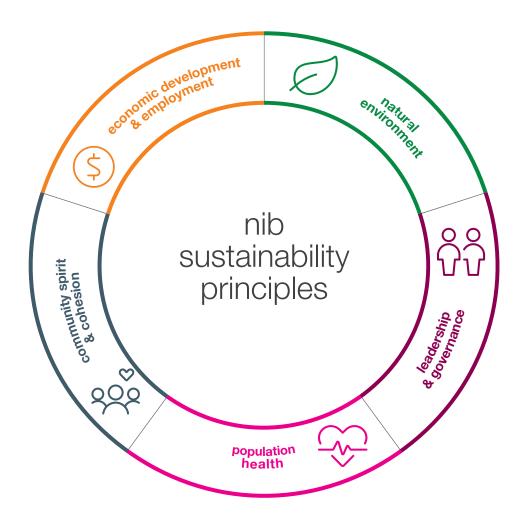


Sustainability report

# nib sustainability principles

We recognise that how we go about our business, including the examples we set, directly and indirectly impact the communities in which we operate and their sustainability.









economic development & employment





The quality of peoples' health is influenced by the communities where they live and work.

We develop and invest in broad community-based programs, which aim to control and limit disease, improve health literacy and overall population health, with a focus on preventative health measures.

The quality of the natural environments in which we live are similarly influential on people's health.

The quality of air and water, biodiversity and climate stability are crucial to the health and wellbeing of our stakeholders.

We will improve our business processes to limit our impact on the environment.

We believe investment and employment are important to the overall health and wellbeing of our communities and that we have a leadership role to play in encouraging inclusion and equal opportunity.

Our procurement policies enable our business to be mindful of potential downstream effects of our supply chain and we aim to ensure our suppliers comply with applicable laws and standards of business ethics, health and safety and environmental protections.

Strong community spirit and cohesion are good for the psychological and physical resilience of communities.

We believe a strong sense of belonging, social justice, practicing tolerance and respect of differences is essential to fostering resilience in healthy communities.

Our partnerships with the community build resilience and reduce inequalities, with a special focus on preventative health, mental wellbeing and Aboriginal health.

We strongly believe in the importance of having the highest standards of ethical practice and good governance in business and public institutions.

We understand the risks associated with our business operations and the potential consequences for our stakeholders in failing to manage these risks.

We understand how the behaviour of companies like ours can influence others operating in our communities.

# Message from the Chief Risk Officer

For a business whose core purpose is the better health of our members and travellers, FY20 has been among the most challenging periods in recent times.

COVID-19 has impacted the lives of people around the globe, and the health and travel sectors have been at the forefront of its impact. Adding to this, many of our members and their communities have recently struggled through the worst drought in living memory, as well as the devastating effects of Australia's bushfire season.

For nib, we have a critical role to play in helping our communities stay healthy throughout periods of hardship. Guiding our decision making, particularly in recent times, has been our Sustainability Principles and our commitment to helping people enjoy better health. And while all aspects of our sustainability agenda support our objective of making the world a better place, the area where nib can make the most profound impact is the health and wellbeing of our members, travellers and communities.

A highlight during the year was the announcement of our \$1 million funding commitment towards programs aimed at closing the gap in health and life expectancy outcomes for Aboriginal and Torres Strait Islander peoples. This is an area set to become a much larger focus for our business in the coming years, with a view to contributing as a long-term partner to Aboriginal and Torres Strait Islander communities in regions where we operate.

We've also further enhanced the reporting within our Natural Environment pillar, allowing us to share more detailed information about nib's environmental footprint and the measures we're taking to further reduce our impact. We continue to report to the global Carbon Disclosure Project (CDP) and we're working hard to develop our impact measurements in line with the CDP's clear framework for climate stewardship.

I'm pleased to be able to share our FY20 Sustainability Report with you and I look forward to keeping our stakeholders up to date on our continued progress.

#### **Roslyn Toms**

Group Executive - Legal and Chief Risk Officer

# Roles and responsibilities

#### **Board**

The nib holdings limited Board holds ultimate responsibility for the oversight and operation of our sustainability strategy. The Board is supported by the Chief Risk Officer and the Management Sustainability Committee.

# **Group Executive - Legal and Chief Risk Officer**

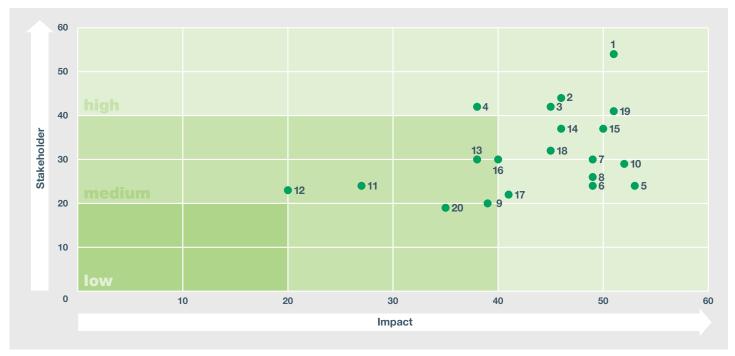
The Group Executive - Legal and Chief Risk Officer is responsible for managing the Legal, Risk, Compliance and Governance functions across the nib Group. This function also includes responsibility for community and sustainability, including the management and delivery of our sustainability activities.

#### **Management Sustainability Committee**

nib's Management Sustainability Committee oversees the implementation and operational effectiveness of our Sustainability Principles and initiatives. This includes helping implement change across our business, enhancing our sustainability monitoring and exploring opportunities for improvement. The Committee is chaired by the Company Secretary and Chief Risk Officer and includes members from the Executive team and other key leaders from across the nib Group.

# **Material issues**

Materiality assessments are designed to map out our most material social, environmental and governance issues. In addition, the way we identify our material topics and align them with relevant megatrends, in consultation with internal and external stakeholders, ensures we report in the spirit of the principles of the Global Reporting Initiative (GRI) Standards. We conducted our most recent materiality assessment in 2019, which identified 20 material issues.



# **Material issues**

- Cost of care and insurance
- 2 Building credibility and trust
- 3 Supporting the healthcare journey
- 4 Customer/member centricity
- 5 Responsible use and protection of data
- 6 Demonstrating value
- Employee satisfaction

- Diversity and inclusion
- 9 Technology impacting workforce
- 10 Workplace health and wellbeing
- 11 Climate change and health impact
- 12 Environmental responsibility
- 13 Population health/minority groups
- 14 Navigating health technology

- 15 Preventative health
- 16 Mental health
- 17 Ethical investment
- 18 Public policy impact and engagement
- 19 Governance and risk management
- 20 Ethical supply chain

As part of the assessment, we interviewed key internal and external nib stakeholders including shareholders and key business partners to uncover what they consider to be the most important issues that nib should be addressing. We also engaged our members, travellers and employees through an online survey to explore which issues they consider to be the most material.









# FY20 highlights







Drought, bushfire and COVID-19 premium relief support for members



health management

The quality of peoples' health is influenced by the communities where they live and work. We develop and invest in broad community-based programs which aim to control and limit disease, improve health literacy and overall population health, with a focus on preventative health measures.

#### Our COVID-19 response

As COVID-19 began to unfold, we moved quickly to support our members and travellers, implementing a member and community support package in response to the pandemic.

#### Members and travellers

Many nib members confronted financial uncertainty and the threat, or reality, of unemployment. To assist, we extended our financial hardship options for eligible members, including offering special premium relief and the ability to suspend their health insurance policy and premium payments for up to six months, while remaining covered for COVID-19 related treatment.

On top of this, we expanded coverage for chest, lung, kidney and bladder, or other treatment related to COVID-19, across all levels of hospital cover (including Basic and Bronze where currently excluded) at no additional cost. This means more than 300,000 policies, or over 560,000 of our members, who would not otherwise have been covered, had access to COVID-19 treatment.

We extended benefits for psychology services for all members with ancillary cover, and helped members stay healthy at home by paying benefits towards a range of telehealth services including psychology, occupational therapy, dietetics, speech therapy and podiatry.

We also offered eligible members, who work in frontline health services, a \$250 rebate to support their health and wellbeing, by helping them to purchase everyday items.

Our health management and emergency assistance team, nibAssist, was on hand 24 hours a day and seven days a week to help our

travellers and members who required COVID-19 medical and nonmedical health support, wherever they were in the world.

We worked around the clock with our various partners to bring our travellers home, many of whom had been stranded by border closures as a result of the pandemic. In liaison with our partners, including travel agents, we also provided travellers with important and up to date information about any COVID-19 impacts on their insurance.

#### Community health

Frontline healthcare workers have worked tirelessly to prepare our health system and help treat patients throughout the pandemic. In recognition of this, we announced several measures to assist those working hard to protect the community.

The first was the donation of 100,000 urgently needed surgical face masks to the Hunter New England and Central Coast Primary Health Network.

The face masks were distributed to GPs, pharmacists and allied health professionals, including physiotherapists, chiropractors and dieticians, so they could continue to see and treat patients safely during the pandemic.

We also provided funding to Hunter Medical Research Institute to assist Hunter New England Health in evaluating up-to-date evidence to better inform the public health response to the COVID-19 pandemic. The funding meant clinicians could access the most up to date global research and evidence to inform patient care and community health.

# Member snapshot

	FY20 FY		
Number of policyholders			
Australian Residents Health Insurance	619,079	607,388	
International (Inbound) Health Insurance	183,243	172,357	
New Zealand	118,259	110,121	
Total	920,581	889,866	
Number of persons covered			
Australian Residents Health Insurance	1,186,805	1,176,155	
International (Inbound) Health Insurance	200,254	188,324	
New Zealand	226,925	213,061	
Total	1,613,984	1,577,540	

	FY20 FY		
Health insurance claims paid¹ (\$m)			
Australian Residents Health Insurance	1,725.5	1,639.0	
International (Inbound) Health Insurance	61.8	42.4	
New Zealand	146.1	130.0	
Total	1,933.4	1,811.4	

<sup>1</sup> Health insurance net claims incurred (excluding claims handling), underwriting segments only.



#### Member satisfaction

	FY20	FY19
Net promoter score		
Australian Residents Health Insurance	35.3	32.5
International Students Health Insurance	43.2	34.6
International Workers Health Insurance	47.1	41.5
New Zealand	32.9	34.0
nib Travel <sup>2</sup>	64.2	61.2
GU Health	17.2	15.9
Group (weighted average)	34.8	32.5

# Complaints to Private Health Insurance Ombudsman -Australian Residents Health Insurance<sup>3</sup>

	FY20	FY19
Number of complaints	**	287
Number of disputes	**	33
Private health insurer share of complaints	**	8.4%
Private health insurer share of disputes	**	8.9%
Private health insurer market share <sup>4</sup>	**	8.5%

# Honeysuckle Health

Significant progress was made during the year in terms of our Population Health pillar to engage our members through more accurate and individualised data to actively help them prevent, manage or treat future health risks. We're achieving this through the creation of health agency, Honeysuckle Health, a joint venture between nib and US-based Cigna Corporation.

Honeysuckle Health's specific purpose is to deliver better health outcomes for members and the community generally. It's a giant step in our ambitions to play a more substantive and cost effective role in the shift from "sick care" to more personalised "healthcare". This is a key enabler in helping our members, in collaboration with their doctors, to keep healthy, rather than simply being there for them when they're already sick or injured.

# **Health management programs**

# **Discharge Support Program**

The Discharge Support Program is a great example of how we're using personalised information to provide better treatment options for our members. Members can often feel overwhelmed at the idea of transitioning from hospital to home, particularly after a major procedure or a lengthy stay.

The program is designed to ensure members don't have unmet needs that may result in them returning to hospital. A nurse is regularly in contact with the member to support them in managing their recovery at home. Honeysuckle Health will now be able to use tailored and personalised information for members enrolled in the program to better facilitate the best care as quickly as their needs require.

#### **Nourish Baby**

To support our members with the knowledge and tools they need to plan their birth experience and approach to early parenting, we've partnered with Nourish Baby to provide free access to expectant parents to their online education program. The pilot program has been critical in providing new parents with urgent access to reliable, accredited online services when many pre-natal classes and services were cancelled during COVID-19.

- Excludes GU Health.
- nib aims to have the number of complaints to PHIO to be less than market share.

Number of participants – Australian programs	FY20	FY19
Bone Health	0	1
Care Point	83	222
Care Transition	159	257
Diabetes Action	7	12
Discharge Support Program	6,130	7,316
Healthy Heart	6	10
Healthy Weight for Life™	168	182
Honeysuckle Health Discharge Support Program	194	n/a
MindStep™	66	87
Risk Factor Management	10	n/a
The COACH Program®	299	564
Vitalis CDMP	358	1,550
Number of participants – New Zealand programs	FY20	FY19
Help Me Manage My Back	60	**
Help Me Manage My Hip and Knees	25	**
Help Me Manage My Prescriptions	244	**
Help My Heart Health	14	**
Help My MANA <sup>5</sup>	20	**
Support Me With My Chronic Condition	12	**
Support My Hearing⁵	96	**

# Reactive case management

Support My Smile<sup>5</sup>

Support My Vision<sup>5</sup>

We continue to offer personalised support to international students and workers studying in Australia, helping them navigate the Australian healthcare system to ensure they access the right care at the right time. We're also able to help minimise their out-of-pocket expenses and reduce uncertainty by providing them with information about costs and treatments for specialists and health providers.

90

381

	FY20	FY19
International students	4,076	4,464
International workers	2,185	2,237
Travel assistance	5,872	5,615

#### Affordability, accessibility & transparency

# Find a provider

Find A Provider is the 'go to' source of information when members are searching for healthcare professionals or when they're going to hospital. The online tool helps our members navigate the healthcare system as well as provide them with the right tools and information to better inform their healthcare decisions.

More recently, we've added additional information for members to help them search for and compare specialists. Members can see if specialists participate in nib's MediGap scheme, how often the specialist performs the treatment and if they're likely to experience an out-of-pocket cost. Connecting with the Whitecoat website, members can also search based on location, cost and quality metrics.

- 5 Available to Ngāti Whātua Ōrākei partnership members only
- Data not available.



#### HealthShare partnership

Out-of-pocket costs continue to be a pain point for our members. Through our HealthShare partnership, we're arming Australian doctors and their patients with information to help them determine their likelihood of being charged a gap payment by a medical specialist.

This information has now been made available at the crucial point of referral by the GP with this information now integrated into the Healthshare's practice management software, as well as through healthshare.com.au and the nib websites.

#### Whitecoat

Health provider website, Whitecoat, allows members to search, find and book a healthcare provider, as well as read ratings and reviews of specialists to make sure they've found the right provider. By providing people with more information, as well as a forum to leave their own reviews and ratings of specialists, we aim to inform and empower our members to make more informed decisions.

	FY20	FY19
New patient reviews <sup>7</sup>		
Australia	179,030	268,853
New Zealand	1,123	4,489
Total patient reviews		
Australia	1,136,812	964,420
New Zealand	5,550	4,489
New healthcare providers registered		
Australia	230,113	195,643
New Zealand	9,287	9,074

#### **Clinical Partners**

An exciting development for the Clinical Partners program this year has been the extension of the program to the Illawarra region, off the back of a successful pilot in the Hunter. The program involves select orthopaedic surgeons committing to perform hip and knee joint replacement surgery for nib members, with no out-of-pocket expenses.

Through the program, members are also provided with increased treatment choice, including the option to recover from the comfort of their home with nib's Rehab at Home program rather than in hospital.

The program includes visits from a dedicated physiotherapist with a rehabilitation plan, as well as personalised support from a nib program coordinator.

To date, over 750 members have either enrolled, are undergoing or have completed surgery as part of the program. We look forward to increasing this number considerably as more surgeons across Australia commit to "gap free" procedures.

#### Natural disaster relief

During the period, Australia battled through one of the worst droughts in recent history, as well as devastating bushfires that ravaged large parts of the country.

To assist those members who had been affected personally and financially by these natural disasters, we offered a helping hand through the introduction of special health insurance premium relief waivers, financial hardship policies and community support initiatives.

#### Population health initiatives

Our first program of its kind with Auckland iwi, Ngāti Whātua Ōrākei, has continued to provide access to comprehensive private health insurance. This was the second year of the initiative, which is designed to improve access to quality healthcare, with the aim of improving health outcomes for their families.

This year, we helped deliver a series of health-themed events, which brought allied health professionals and partners to the iwi to improve access to health provider services. Our Waitangi Day event alone saw more than 650 health checks and education sessions provided. For more information about the program, visit nib.co.nz/ngatiwhatuaorakei/

Ngāti Whātua Ōrākei partnership	FY20	FY19
Number of persons covered	3,934	3,331
Claims paid	\$1,523,505	\$1,029,469

#### nib foundation

Our charitable foundation, nib foundation, makes a positive and lasting impact on nationwide health issues by funding innovative and practical approaches to improve the health of communities.

In October, the foundation announced that it will donate \$1 million to help fund programs aimed specifically at closing the gap in health and life expectancy outcomes for Aboriginal and Torres Strait Islander peoples.

You can learn more about nib foundation later in this report.

- · Review the efficacy of our health management programs to ensure outcome benefits and return on investment
- Better identify members who will benefit from health management programs using predictive modelling to target members based on individual health needs and outcomes
- Expand the discharge support program to approximately 1,000 additional members per month
- · Develop and implement a framework to guide how we monitor and report on health outcomes and progress efforts to improve health and wellbeing for members
- · Develop a health and wellbeing dashboard, linking program-specific outcomes, member reported outcomes, longer term health indicators for the nib population and general population health data
- Extend the Going to Hospital tool to international students and workers
- · Launch the Find a Provider tool in New Zealand, as well as to corporate clients and strategic partners

<sup>7</sup> Based on total Whitecoat surveys which includes where a patient has answered the rating questions but not left a comment





# FY20 highlights



Divestment from carbon intensive fossil fuels



First Waste **Action Plan and** working group launched



**Climate** change incorporated into the **Group Risk** Management Framework



**Continue to** participate in the Carbon **Disclosure** Project (CDP)

The quality of the natural environments in which we live are similarly influential on people's health. The quality of air and water, biodiversity and climate stability are crucial to the health and wellbeing of our stakeholders. We will improve our business processes to limit our impact on the environment.

# Our COVID-19 response

As our business adapted to changes brought on by COVID-19 including moving to a new work from home environment, we naturally saw a dramatic drop in our waste and emissions. This includes no domestic and international air travel, close to zero waste or printing, as well as low energy use with our office locations being closed and employees working from home.

These changes have also allowed us to rethink the way we work in terms of our waste. We reviewed the automated in-house printing

of reports and documents and systematically eliminated those that aren't needed, not only to reduce our footprint but to ensure a seamless transition to remote working. It's also made us challenge our need for business travel, both domestic and international as we rapidly adopted online communication tools.

Our teams are also reviewing their future ways of working in the context of eventually returning to the office and thinking about how we can collectively lessen our impact on the environment.

#### Responsible investments

One of the key recommendations that came from our climate change scenario analysis was the further enhancement of the responsible investment screening of our portfolio. As a result, we completed our divestment from companies with primary revenue derived from carbon intensive fossil fuels (thermal coal and tar sands) during the period.

We are also committed to measuring and reducing the carbon footprint of equity investments across our portfolio. Through our investment manager, Mercer, we expect a reduction of at least 20% compared to the market on an annual basis.

# **Environmental reporting**

#### **Emissions**

Our Environmental and Waste Snapshot, which provides a highlevel look at our major factors of emissions and waste is helping to improve our understanding and communication of what we need to do to lessen our impact on the environment. We're now aware that our top emissions factors are energy consumption, followed closely by business travel (international, domestic and land travel), as well as paper use for internal and external printing.

We also continue to participate in the CDP's annual Climate Change Questionnaire, which enables companies to measure and manage our environmental impacts, in turn encouraging us to take meaningful steps towards climate change.

#### **Energy consumption**

We seek to align with Green Star certification requirements to lessen our environmental impact, including taking into consideration the performance rating of the base building and ensure we follow best practice standards for office fit outs.

This is reflected in our Newcastle office, which has a 4 Green Star rating and 5 star NABERS energy rating, while both our Sydney and Melbourne offices boast a 4.5 NABERS energy rating. In addition, our Auckland building has a 4.5 NABERSNZ energy rating.

#### Waste action plan

This financial year, we developed a Waste Action Plan that is driven by a working group with cross-business representation to ensure we are making real changes in our business to limit our impact on the environment.

A highlight of the period was encouraging more members to elect to receive their member communications via email. Around 84% of our Australian members and 87% of members in New Zealand now utilise online communication as their preferred method of contact.



# **Emissions inputs**

	FY20	FY19
Paper consumption (kg)		
Copy paper	6,250	6,979
Printing paper & envelopes	37,860	43,937
Paper consumables	4,943	8,934
Efforts to reduce paper consumption		
Members with email as preferred method of	contact	
Australian Residents Health Insurance	84.2%	81.7%
International Students Health Insurance	99.4%	99.4%
International Workers Health Insurance	99.9%	99.9%
New Zealand	87.0%	83.0%
Shareholders on partial eComms	2.7%	9.5%
Shareholders on full eComms	47.8%	41.2%
Business travel		
Land travel		
Fleet car kms	44,486	146,409
Employee vehicle claimed kms	155,646	243,780
Employee commuting kms	8,093,567	**
Hybrid fleet vehicle percentage	50.0%	50.0%
Air travel kms		
International & domestic	4,653,955	6,613,609
Carpooling program		
Number of employee participants	353	314
Kilometres saved	39,596	81,931
C0 <sub>2</sub> saved (kg) <sup>1</sup>	9,899	33,340
Energy consumption		
Electricity (kWh) <sup>2</sup>	2,666,414	1,948,035
Gas (GJ)	1,108	460

# Climate risk management

As part of our increased focus on climate risk management, we reviewed our controls for addressing identified physical and transition climate related risks across the Group. These risks have now been incorporated into the Group Risk Management Framework (RMF) to ensure ongoing oversight and management. This includes incorporating climate change in regular business unit risk assessments and establishing a 'bottom-up' risk register.

- Develop a plan and set a timeframe to become a carbon neutral business
- · Develop a nib Responsible Investment Policy to enhance our SRI screening of our investment portfolio
- Undertake climate scenario analysis and stress testing for the nib investment portfolio

C02 saved is based on an industry standard of 0.25kg/km Increase in electricity consumption due to expanding scope of reporting to include all international locations.
\*\* Data not available.



# economic development & employment











# FY20 highlights



1,505 employees across 6 countries



Launched a new capability framework to employees



Mobilised our workforce to a work from home environment due to COVID-19



Included in **Bloomberg Gender-Equality** Index for the first time

We believe investment and employment are important to the overall health and wellbeing of our communities and that we have a leadership role to play in encouraging inclusion and equal opportunity.

Our procurement policies enable our business to be mindful of potential downstream effects of our supply chain and we aim to ensure our suppliers comply with applicable laws and standards of business ethics, health and safety and environmental protections.

#### Our COVID-19 response

Like most organisations, COVID-19 tipped our normal way of working on its head, with the majority of our 1,500 strong workforce across the world now working remotely from the safety on their homes.

Making sure our employees are safe and well during this time was, and still is, our top priority. Our people across the Group have been flexible and patient and have adapted well during this time of uncertainty and change.

During the height of the pandemic, we regularly checked in with all of our people to ensure they were clear on their role, they had what they needed to do their job effectively and they had open lines of communication with their teams. We continue to support our people in navigating this new way of working with practical solutions.

To aid our employees in adapting to their new work from home environment, we introduced a new temporary ergonomic reimbursement of up to \$300 AUD to contribute towards a safe home working environment.

We also introduced up to two weeks paid special leave for all nib Group employees who were impacted by COVID-19.

#### The future of work

COVID-19 has forced dramatic change upon organisations, especially where, when and how we go about work, or what we are now referring to as "future work design".

While nobody celebrates the misery and disruption of COVID-19, the pandemic has presented us with an unprecedented opportunity to reconsider how future work design might best serve our fundamental business objectives and the needs of our people.

We're taking a considered approach and going through a process based upon 10 criteria about future work design, in deep consultation with our people. We look forward to sharing more information about this exciting venture in the next financial year when our plans and execution are more developed.

#### **Capability framework**

This year, we embedded a new capability framework, which is designed to provide a Group-wide understanding of our values, as well as the behaviours expected of our people in a high-performance environment.

The framework also provides a clear understanding of what capabilities and skills are required for different roles across the Group to enable our people to develop themselves, while delivering against our strategic plan and future aspirations.

# Our people

	FY20		FY19	
	Female	Male	Female	Male
Number of employees				
Australia	764	430	781	440
Ireland	14	9	15	10
New Zealand	110	67	95	57
Philippines <sup>1</sup>	62	42	50	32
United Kingdom	0	2	0	2
United States of America	5	0	6	0
Total	955	550	947	541
% of total	63.5%	36.5%	63.6%	36.4%

nib travel arranges employment in the Philippines with an outsourcing provider. These contractors have been classified as employees for the purposes of this report due to the nature of their employment agreements.



# Our people continued

	FY20		FY19	
	Female	Male	Female	Male
Employees by age				
<25 years	48	29	66	33
25 – 34 years	339	225	347	216
35 – 44 years	288	192	253	189
45 – 54 years	180	80	177	80
55 – 65 years	95	23	98	21
>65 years	5	1	6	2
Average age of employees	40	37	39	37
Employment level				
Non-Executive Directors	4	3	4	2
Executives	3	9	3	6
General Managers	0	5	0	3
Business Unit Heads	22	25	21	31
Manager / Team Leaders	155	110	147	126
Other workforce	775	401	776	375
Employment type				
Permanent full time	755	505	741	497
Permanent part time	140	12	141	13
Temporary	56	32	60	29
Casual	4	1	5	2
Employment by tenure				
<1 year	159	131	182	125
1 year	135	90	127	85
2 – 3 years	175	118	188	146
4 – 5 years	124	88	101	63
6 - 10 years	185	78	182	74
11 – 15 years	97	32	79	38
16 - 20 years	39	7	48	5
21+ years	41	6	40	5
Percentage of new hires (tenure <1 year)	54.8%	45.2%	59.3%	40.7%
Parental leave				
Employees accessing parental leave	41	12	56	5
Rate of return from parental leave	91.0%	100.0%	96.0%	100.0%
Employees still employed after 12 months following return	85.0%	100.0%	100.0%	100.0%

# **Diversity and inclusion**

We have a strong focus on improving gender equality across the Group in line with our Diversity and Inclusion Policy, starting with our merit-based recruitment selection process. This is aimed at reducing bias, actively addressing diversity ratios, and improving pipeline talent development programs for women.

In January this year, nib was included in the Bloomberg Gender-Equality Index for the first time in recognition of our commitment to supporting gender equality. Focusing on five key areas including female leadership and equal pay, this globally recognised index has allowed us to understand how effectively our business, as well as others internationally, are investing in women. Pleasingly, we received a score of 64.94% which is above the global average of 63.02%.

Our strategic partnership with the University of Newcastle to strengthen our commitment to emerging female leaders within nib through the 'Women in MBA' (WiMBA) program is in its third year, with four employees enrolled this year. We also continue to be a member of the 30% Club in Australia, with the organisation's main objective set to achieve 30% of ASX 300 board seats held by women bv end 2021.

We also joined 'The Inclusive 100', a community initiative to increase employment opportunities and social inclusion of people living with disabilities across the Newcastle, Hunter and Central Coast regions of New South Wales.

In New Zealand, we are creating a community in which everyone can contribute and feel included with a focus on heritage and culture, sexual and gender identity and accessibility. We are building awareness and knowledge of Māori culture, values and language and we provide a safe haven for diverse sexual and gender identities. In addition, we continue to work towards gaining the Rainbow Tick and Accessibility Tick accreditations.

	FY20		FY19	
	Female	Male	Female	Male
Gender pay equity <sup>2</sup>				
Average position in salary range for business unit heads	31.4%	51.6%	34.2%	41.0%
Median position in salary range for business unit heads	41.1%	52.6%	37.3%	41.2%

# **Employee training and development**

We encourage our people to access learning, development and growth opportunities to support their career with us. These opportunities are provided through external education and learning via our Education Assistance benefit, continued professional development support, internal solutions delivered by our very own team of expert facilitators, or using the knowledge of external providers to provide learning for specific roles.

# Traineeship program

Our partnership with Hunter Valley Training Company offered three traineeships within our business in our IT, health services contracting and finance departments. This program aims to break down employment barriers for young people from diverse and vulnerable backgrounds. The program continues to provide us with talented people who make a significant contribution to our organisation during their traineeship program.

# HunterNet scholarship

We offered an inaugural scholarship to an employee to participate in the HunterNet Future Leaders program, which is designed to equip future leaders with the skills, contacts and confidence to lead successfully.

<sup>2</sup> We continue to monitor remuneration of Business Unit Heads (as a % of salary range) to identify and address gender inequity.



	FY20	FY19
Employee development program participation		
Leadership program (internal training)	76	351
Sales and service program (internal training)	174	172
Technical and professional programs (internal training)	996	1,556
Total internal training hours	1,435	5,559
Hunter Traineeships (diverse background)	3	5
Employees receiving education assistance	41	28
Total investment in training	\$654,060	\$1,415,0503

	FY20		FY19	
	Female	Male	Female	Male
Employee succession				
Employees internally promoted	50	38	**	**
Flexible work practices <sup>4</sup>				
Individual flexible arrangement employees	101	7	113	14

# Workplace health and wellbeing

#### nibWell

We've worked to further develop our employee wellness program, nibWell. The program aims to empower employees to make positive and healthy choices, while building a workplace culture that promotes mental health and supports mental illness.

This year we increased the promotion of our smoking cessation program, which provides employees with access to free 'quit smoking' support, as well as up to \$300 in reimbursements to cover the cost of patches, gums and medications. Employees can access the reimbursement once a year until they've been successful in quitting.

We also gave our people exclusive six-month access to the online health and fitness program, Body by Finch, which includes workouts, nutritionist-approved meal plans and meditation sessions, all of which can be used while our employees are working remotely due to COVID-19.

# Work health and safety

At nib we care about our people as much as we care about our members. We are committed to ensuring our people, contractors and visitors have a safe and healthy work environment that is free from harm. The nib Group WHS Committee provides a monthly forum that allows for consultation between management and employees to reduce injury and illness to help nib maintain a safe workplace.

	FY20		FY19			
	VL/L	M	H/VH	VL/L	M	H/VH
Lost time injuries						
Australia	0	3	0	0	1	0
Ireland	0	0	0	0	0	0
New Zealand	0	0	0	0	1	0
United Kingdom	0	0	0	0	0	0
United States of America	0	0	0	0	0	0
Total	0	3	0	0	2	0

VL/L: Impact very low or low M: Impact medium H/VH: Impact high or very high

	FY20	FY19
Group injury frequency rate	1.3	0.94
Absenteeism <sup>5</sup>		
Australia	4.0%	4.4%
New Zealand	2.7%	3.6%
Flu shots given to employees	344	513
Corporate Wellness Programs		
Fitness Program		
Number of employee participants	284	279
Number of family participants	267	264
Quit smoking program	3	0
Employee mental health		
Number of employees with mental health first aid training	28	30
Employee Assistance Program (EAP):		
Employee contacts	206	155
Family member contacts	29	25
Employee EAP consultation usage %	13.7%	11.9%

# **Employee engagement and retention**

# **Employee engagement**

One change in our reporting is that we are not able to report on nib's engagement score for FY20, as we would have expected to do in a normal year. With the advent of COVID-19, it was decided that any engagement information gathered from this point in time would not reflect the feelings of our employees to benchmark against earlier scores. The engagement survey will take place in mid-FY21 and will be reported in next financial year's Sustainability Report. In its place, nib has been conducting regular employee pulse surveys to check-in on the wellbeing of our employees while they work from home.

		FY20	FY19
Employee engagement score <sup>6</sup>			
Employee engagement score		**	69.0%
	F	Y20	FY19
	Female	Male	
Employee attrition			
Voluntary turnover rate	17.5%	20.8%	19.7%
Involuntary turnover rate	6.1%	6.6%	4.5%
Total	23.6%	27.4%	24.2%
	1	FY20	FY19
Enterprise agreements and trade union ne	gotiation	s	
Employees covered by enterprise agreement	;	313	344
Number of consultations/negotiations with trade unions		2	3
Employee representation			
Number of Joint Consultative Committee representatives		18	17

<sup>5</sup> Absenteeism not available for Ireland, Philippines, UK or USA.

<sup>3</sup> FY19 training included one-off training for sales and service functions and people leaders across parts of the nib Group which was not required in FY20. Some face to face training in late FY20 was delayed due to COVID-19 restrictions with this training expected to take place in FY21 subject to restrictions no longer being in place.

In addition to formal arrangements, other strategies are also in place to support flexible working for employees including working from home, flexible working hours, study leave and rostering preferences.

<sup>6</sup> Survey conducted every two years.

<sup>\*\*</sup> Data not available.



#### **Employee benefits**

Employee benefits are a key component in attracting and retaining the best talent to nib. Our People & Culture team have worked with a broad group of partners to negotiate some great discounts and benefits on behalf of our employees which are structured as both core and location specific, depending on jurisdiction. These include family, workplace, career and health and wellness benefits.

#### Work and life benefits

Employee give-aways Leisure travel discounts Volunteer leave Apple employee purchase program Additional leave days Flexible work practices Company paid parental leave Microsoft Home Office Program

#### Finance and insurance benefits

Employee health insurance discounts Wellness bonus Travel insurance discount Employee share plans Corporate bank offer Salary sacrifice Group life insurance Group salary continuance insurance Estate planning discount Transport discounts Pension matching scheme

#### Health and wellness

Gym discounts and fitness initiatives Flu vaccinations Quit smoking programs Employee assistance program Onsite health and wellness services Weekly fresh fruit Eye care discounts

#### Reward and recognition

Years of service awards Short term incentive program Annual achievement awards Christmas gift

# Career and development

External training Educational assistance

#### **Employee share plans**

One of the ways we recognise the valuable role our employees play in our ongoing success is through our employee share plans. Consistent with our aim of improving employee engagement, this provides employees with an opportunity to share in the future of our business. Under the plans, eligible employees can choose to receive part of their remuneration in the form of shares, through a purchase scheme, rather than as cash.

	FY20	FY19
Participation in employee share plan		
Australia		
Employee Share Acquisition Plan	32.9%	37.8%
Business Unit Head Salary Sacrifice & Matching Share Plan	69.6%	66.0%
New Zealand		
Employee Share Purchase Scheme	17.8%	22.7%
Business Unit Head Salary Sacrifice & Matching Share Plan	57.1%	66.7%

# **Economic development**

We are proud to provide employment for over 1,500 people in six countries, helping to make a significant contribution to the communities in which we operate. Further, our financial contribution to these communities aligns to our overall purpose by paying claims and dividends, providing employment, buying products and services and paying taxes. Further information is provided in nib's 2020 Tax Transparency Report.

	FY20	FY19
Tax contribution		
Income and other taxes (\$m) <sup>7</sup>		
Australia	63.9	61.8
Group	70.0	67.4
Effective tax rate		
Australia	28.9%	28.3%
Group	28.6%	29.9%

- Develop and execute a plan for the "Workplace of the Future"
- · Reimagine and embed a group wide Diversity and Inclusion strategy
- · Use data from employee Health Risk Assessments to develop and implement preventative health measures and initiatives

<sup>7</sup> Includes corporate income tax, employee taxes and stamp duty paid.



# community spirit & cohesion











FY20 highlights





customer giving



committed for disaster support funding



\$1.0m

announced for Aboriginal **Health Partner**ships program

Strong community spirit and cohesion are good for the psychological and physical resilience of communities. We believe a strong sense of belonging, social justice, practicing tolerance and respect of differences is essential to fostering resilience in healthy communities. Our partnerships with the community build resilience and reduce inequalities, with a special focus on preventative health, mental wellbeing and Aboriginal health.

#### Our COVID-19 response

While the long-term consequences of COVID-19 are still very uncertain, we already know that the pandemic has heavily strained social and community systems. We also recognise that the pandemic is set to have both short term and long term health and wellbeing impacts on our communities.

To help community organisations deal with the increase in demand for their services and support during the crisis, we announced \$1 million in funding together with nib foundation to support charitable initiatives. We also provided \$500,000 additional funding to support a range of clinical health initiatives.

Partnering with Lifeline Australia and Lifeline Aotearoa, we're helping to ensure Aussies and Kiwis who require mental health support during the pandemic are able to access immediate support. Our funding will help Lifeline Australia to expand its crisis text-based service and Lifeline Aotearoa to provide an additional 2,300 hours of crisis support.

We've also helped NSW Rural Doctors Network to develop self-care and wellbeing resources for health professionals living in remote, rural and regional communities. Through these resources and support networks, we hope that all rural healthcare professionals will feel supported to do their jobs and take care of their health and wellbeing, so that all Australians, wherever they may be, can continue to receive quality healthcare.

Our partnership with Clearhead in New Zealand will also help ensure more Kiwis and their healthcare professionals can easily access mental health services, through the development of a free, secure telehealth platform.

We've also assisted international students to maintain their health during the pandemic by donating hundreds of health and hygiene care packages to University of Newcastle students as well as funding 54,000 meals through OzHarvest's Hamper Hubs program.

#### nib foundation

Our charitable organisation, nib foundation, marked a major milestone, reaching more than \$21 million in grant funding since inception. The foundation supports community initiatives that share our goal of improving health literacy and health promoting behaviours to prevent risk of disease, reducing cultural, social and gender inequities, and improving health outcomes for communities in need.

More than 740,000 Australians are engaging with programs designed to help them live healthier lives thanks to \$1.4 million in funding towards health prevention programs during FY20. Ninety six percent of participants in these digital health programs were supported to explore ways to reshape their attitudes towards health and lifestyle risk factors, such as poor diet, and helping to reduce their risk of chronic disease.

We've announced a new Aboriginal Health Partnerships program, which will provide \$1 million in funding over four years, to support a suite of projects focused on improving the emotional and social wellbeing of Aboriginal and Torres Strait Islander youth. The funding was made possible with the donation of unclaimed dividends from nib shareholders to the nib foundation.

Partnerships have already been established with the Clontarf Foundation and the National Centre of Indigenous Excellence to boost school attendance and employment prospects, as well as engage the whole of community in exercise and wellbeing activities to help reduce health inequities in a cultutrally safe environment.

Through the initiative we will continue to work with community-led organisations to help tackle the current 10-year life expectancy difference between Indigenous and non-Indigenous Australians and address other significant gaps in health and education outcomes.



nib foundation continued	FY20 FY		
Grants			
Prevention Partnerships	\$1,018,018	\$1,258,600	
Health Smart Grants <sup>1</sup>	\$240,000	\$284,306	
Aboriginal Health Partnerships	\$70,000	n/a	
Community Partners	\$792,150	\$222,746	
Employee nominated Good Cause Grants	\$35,000	\$30,000	
Total	\$2,155,168	\$1,795,652	
Charity partnerships			
Prevention Partnerships	5	5	
Health Smart Grants	6	10	
Aboriginal Health Partnerships	2	n/a	
Community Partners	10	8	
Employee nominated Good Cause Grants	7	6	
Total	30	29	

# Natural disaster support

Exposure to disaster events, like the recent Australian bushfires and drought, can have a significant impact on the mental health and wellbeing of communities. That's why we committed \$150,000 in funding to Mackillop Family Services and Upper Hunter Community Services to help a number of severely impacted regional communities in their recovery.

#### **Customer giving**

Through our partnership with The Footprints Network, our nib Travel customers are encouraged to make micro-donations to community development projects when they buy travel insurance with World Nomads and Travel Insurance Direct.

This year, Footprints reached a record total of \$5 million in microdonations and funded our 200th project since establishment in 2006. These donations go directly to our non-profit partners to fund projects that align with the UN Sustainable Development Goals to help end poverty and shift the world onto a more sustainable and resilient path.

Further information about The Footprints Network is available at footprintsnetwork.org

	FY20	FY19
Donations		
Donations received	\$533,034	\$690,433
Number of donors	158,660	212,893
Funding		
Funding allocated	\$600,597	\$750,604
Charities funded	13	14
Projects funded	31	30
Countries impacted	23	18

# **Employee giving**

We support our employees to give back to the communities in which they live and work through our employee giving program, nibgive. The program includes fundraising, volunteering and payroll administered donations via our Small Steps program. In addition, nib foundation matches all employee donations dollar for dollar.

A highlight this year was our employees running almost 16,000 kilometres to raise more than \$32,000 for Multiple Sclerosis research during MS Research Australia's The May 50K. The event brought our fundraising efforts for the year to around \$72,000.

	FY20	FY19
Employee giving		
Employee fundraising donations	\$56,191	\$28,193
Company and nib foundation matching donations	\$43,206	\$30,608
Charities supported	13	10
Employee volunteering		
Charities assisted	8	12
Volunteer hours	657	1,084
Employee participants	115	175
Value of time	\$29,631	\$37,349

<sup>1</sup> Community Grant FY19 was rebranded to Health Smart Grant.



# **Corporate Partnerships**

In FY20, we reviewed our sponsorship portfolio to deepen our relationship with organisations aligned with our purpose of Your Better Health and our nib values.

In line with this, we extended our AFLW partnership with Richmond Football Club, which cemented our desire to see greater equality and diversity in major sports leagues. We also helped the Aucklandbased Blues celebrate the diversity of their club, fans and LGBTQIA+ community through our rainbow initiative within the opening rounds of the 2020 Super Rugby competition.

# Sponsorship partnerships:

Newcastle Knights (NRL) New South Wales Rugby League (State of Origin NSW Blues) Newcastle Jets W-League Richmond Football Club (AFL & AFLW) The Blues (Super Rugby, New Zealand)

# **Community partnerships:**

Auckland Chinese New Year Festival (NZ) Auckland Round the Bays (NZ) Got Your Back Sista Indian Weekender (NZ) Mark Hughes Foundation NZ Men's Health Trust (NZ) Ronald McDonald House Charities® (NZ) The Salvation Army (Hunter branch) Voyager Media Awards (NZ)

- · Leverage our relationships with sponsorship partners to have greater impact on community, via nib foundation initiatives
- Work with our community partners to ensure we are providing flexible and best practice support during COVID-19 recovery
- · Develop our Aboriginal health partnerships to support nib foundation's new commitment to Aboriginal and Torres Strait Islander health
- Introduce a new Group-wide employee giving digital platform to enhance our nibgive employee giving program











# FY20 highlights



Multi-year Risk Management Improvement **Program** completed



**NZ** Conduct & Culture review submitted to RBNZ



Transitioned to new edition of **ASX Corporate** Governance **Principles &** Recommendations



**Uplifted data** governance and delivered on nib's cloud migration strategy



Led the formation of an industry group to tackle modern slavery risks

We strongly believe in the importance of having the highest standards of ethical practice and good governance in business and public institutions. We understand the risks associated with our business operations and the potential consequences for our stakeholders in failing to manage these risks. We understand how the behaviour of companies like ours can influence others operating in our communities.

# **Our COVID-19 response**

The dynamic nature of the pandemic has proven to be a test of resilience for nib on multiple levels, operationally, strategically and individually. We leveraged our solid foundations for managing risk in order to quickly refocus our efforts on strategic risks, opportunities and demonstrate agility in our COVID-19 response for members and travellers.

Pleasingly, we were in a strong position to quickly support selfisolation and social distancing in a work from home environment. Our ability to rapidly adapt to these new conditions was thanks to our ongoing focus on improving and testing our Business Continuity Plans. Our geographically diverse and agile working practices were also supported by nib's investment in mature communications platforms and secure network communications capabilities.

We continue to engage with and keep our regulators updated on the status of our COVID-19 response plans to ensure alignment and positive contribution to overall corporate and community expectations.

# **Governing grounds**

In line with the approach recommended by the ASX Corporate Governance Council's Corporate Governance Principles & Recommendations (Fourth Edition), released in February 2019, nib has adopted the reporting requirements in this year's reporting (ahead of the FY21 required timeframe). The recommendations reflect community expectations for organisations to improve their transparency and to address emerging issues around culture, values and trust.

Our Board and Management are committed to achieving and demonstrating the highest standards of corporate governance and ensuring compliance with the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations. You can see more details about our Corporate Governance practices, management and policies at nib.com.au/shareholders

# Creating a more sustainable supply chain

# **Human rights statement**

We've released our first Human Rights Statement, which sets out our responsibility to protect the human rights of our members and travellers, our people, those in our supply chain as well as our wider community, as articulated in the Universal Declaration of Human Rights.

The statement is a clear reflection of our nib values; particularly making the world a better place and that everyone deserves to be treated with respect. We are working hard to continue to strengthen our ethical business practices, no matter where we operate in the world.

Our focus on continuous improvement reflects nib's belief that the success of our business can only be achieved through our success in fulfilling our purpose and meeting community expectations.

# **Modern Slavery Statement**

In FY21, we will publish our first Modern Slavery Statement under the Modern Slavery Act 2018 (Cth). The Act aims to protect human rights by requiring reporting entities to assess and address any potential modern slavery risks in their business' supply chain. We are extremely supportive of the Act and are working closely with our suppliers and partners to play our part in driving change.

To support our efforts, we've established a working group to review and address any modern slavery risks within our own operations, supply chain and financial investments. We have also introduced a Supplier Code of Conduct, which sets out the commitments, and principles we expect of all our supply chain partners.

Recognising the impact an industry approach would deliver, we created a private health insurance consortium featuring the majority of Australian health funds that are working together to address modern slavery risks across the industry. We've also started engaging with our suppliers to support them on the journey to compliance and are training our people to encourage identification of any potential modern slavery red flags.



#### Tax policy, strategy and governance

We recognise tax governance and tax risk management play a key role in good management and corporate governance. nib is committed to complying with our taxation obligations both in Australia and in all countries in which we operate.

We have a robust tax governance policy and framework and update our processes to align with the Australian Taxation Office's Tax Risk Management and Governance Review Guide. We also regularly report our taxation affairs to our Audit Committee and Board. You can view our Tax Transparency Report at nib.com.au/shareholders

#### **Conduct and culture**

Corporate conduct and culture continues to be an important focus area for regulators, boards and management. As requested by the Reserve Bank of New Zealand (RBNZ) and the Financial Markets Authority (FMA) New Zealand, nib New Zealand submitted its Conduct and Culture Review to the Board in October last year. In addition, we voluntarily submitted the review to both regulators to increase transparency and disclosure of our review processes and their findings.

Following these submissions, we've launched a program of work which includes reviewing customer communications, complaints, and the treatment of our most vulnerable members, employee training and development modules, product framework, value and simplification, reviewing policy documents, re-underwriting and special terms, conduct and culture governance and risk management, as well as oversight of third party intermediaries, quality of advice and effectiveness of servicing.

We have also progressed successfully in adopting a reporting framework and a program of work for continuous improvement for our conduct and culture. The reporting framework is a dashboard developed for our New Zealand Board and executives to have high-level oversight of conduct and culture risk though streamlined reporting and risk visualisation. By aggregating the data into a dashboard and creating a criteria scoring system, the new tool enables an overall view of conduct and culture across nib New Zealand.

We're proud of the improvements that have resulted from the Conduct and Culture Review and are now able to add these learnings and tools to previous reviews undertaken, such as nib's Risk Governance Self-Assessment submitted to the Australian Prudential Regulation Authority (APRA), to uplift nib's Group Risk Culture practices and capabilities.

In line with nib's Code of Conduct, our employees are expected to observe the highest standards of fair dealing, honesty and integrity in relation to how we behave with each other, our members, suppliers, shareholders, regulators and other stakeholders.

	FY20	FY19
Whistleblower register reports	0	0
Code of conduct breaches	8	8
Privacy related complaints upheld	0	0

#### Risk management

nib's multi-year Risk Management Improvement Plan (RMIP) was finalised during the year and featured a review and enhancement of the risk management function and structures for governing risk across the nib Group. The plan has improved our risk management practices and has taken account of enhanced requirements, industry best-practice, regulatory approaches and revised business plans.

With the RMIP finalised, the focus now shifts to maximising the ongoing operational effectiveness of nib's Risk Management Framework (RMF). In FY20, nib's Executive Management Risk Committee and Board Risk and Reputation Committee undertook an annual review of nib's risk management framework (including a review of nib's Risk Appetite, Risk Management Strategy and Key Enterprise Risks) to ensure that nib's risk management framework continues to be effective and relevant to nib.

#### Privacy and data security

In July last year, APRA introduced a new Prudential Standard for Information Security - CPS234, which aims to ensure APRA regulated entities take additional measures to be resilient against information security incidents, including cyber attacks.

Adhering to these new standards allows us to manage content more securely and respond to any cyber security breaches more effectively. To meet these standards, we introduced a new Information Classification and Handling Policy that provides our employees with clear instructions of their responsibilities for classifying and handling information. We also introduced an information management tool for classifying nib Group data. These tools are designed to ensure that nib's information is handled in accordance with the required level of sensitivity.

Data Governance and Privacy has also been included as Key Enterprise Risk (KER) to ensure ongoing oversight and management with a Data Governance Committee, established to formalise nib's information governance and assurance activities.

# **Cloud migration**

nib achieved a major milestone in the Australian cloud technology landscape with the successful migration of the system of record to the cloud for GU Health. The migration is one of the earliest migrations of an insurance system of record to the cloud in Australia and was done in consultation with APRA. nib's "cloud first" approach means we're positioned to innovate quickly and provide our members and travellers with market-leading technology and functionality.

A key component of the project was developing a strong governance and compliance system that was reflective of the digital environment. Ensuring the security of our members' and travellers' information was a priority focus.

You can find more information on nib's approach to privacy and data security at nib.com.au



#### **Compliance training**

nib transitioned to a single learning platform across the Group and undertook a review of all compliance training modules in FY20, including introducing new content to meet requirements for the EU's General Data Protection Regulations and Modern Slavery.

Our compliance training courses use scenarios, problem-based exercises, role plays and other interactive methods to help build understanding within our employees around compliance and its importance. We also report the completion rates for compliance training to our Risk and Reputation Committee to promote accountability and maintain oversight.

# **Group compliance training modules**

Acceptable Use of IT Policy

Anti-Bullying, Harassment and Discrimination

**Business Continuity Management** 

Code of Conduct

**Compliant Trading** 

Conflicts of Interest

Credit Card Security Policy

Data Privacy and Protection

Discipline Policy and Procedure

Drug and Alcohol Policy

Fraud and Corruption Awareness

General Data Protection Regulation (GDPR)

General Security Awareness

Grievance Policy and Procedure

Mobile Devices Policy

Modern Slavery Act Awareness

**Trading Policy** 

Work Health and Safety Fundamentals

Workplace Surveillance Policy

Note: Additional business segment, jurisdiction and role specific compliance training also provided.

- Upgrade nib's Risk and Compliance system technology to improve management of risk and compliance data, as well as enhanced functionality for data aggregation, workflow and reporting
- · Continue to embed nib's Risk Management Framework, including initiatives to improve the measurement and reporting on risk culture
- · Build on our existing sound business practices to comply with evolving governance, remuneration and accountability regulations
- · Harness data governance and cybersecurity capability to support our personalisation strategy
- Publish our inaugural modern slavery statement