

# Global Modern Slavery Transparency Statement

Version: June 2025

This statement covers the period for the financial year ending December 31, 2024, and describes Aon's present and ongoing commitment to keep modern slavery out of the firm's business and supply chain.

## <u>Purpose</u>

Aon recognizes that companies have an impact on human rights, and we do not tolerate modern slavery, forced labour, child labour or human trafficking (together "modern slavery") in all parts of our business and supply chains.

We are committed to maintaining a culture of integrity, transparency and accountability – as well as to complying with all applicable laws – across our job responsibilities and geographical locations. Aon expects the same commitment from its suppliers, agents and joint ventures.

# **About Aon**

Aon, a leading global professional services firm, is headquartered in Dublin, Ireland, with our global operations headquartered in London, United Kingdom. Through actionable analytic insight, globally integrated Risk Capital and Human Capital expertise and locally relevant solutions, our 60,000 colleagues provide clients in over 120 countries with the clarity and confidence to make better risk and people decisions that protect and grow their businesses.

Our stock (AON) is listed on the New York Stock Exchange. More information on Aon can be found in our <u>Annual Report</u> on our <u>website</u>.



## **Compliance**

To comply with the reporting requirements of the United Kingdom Modern Slavery Act 2015 (section 54) and the Commonwealth Modern Slavery Act 2018 (section 16 of the Modern Slavery Act 2018 (Cth) (MSA), and other applicable laws and requirements globally, this statement is given for the year ending December 31, 2024, on behalf of Aon plc and its wholly owned subsidiaries and branches of subsidiaries<sup>1</sup>.

We continue to align our policies and practices with international standards, including the principles contained within the Universal Declaration of Human Rights and the International Labour Organisation Core Conventions on Labour Standards.

Although Aon procures goods and services from a wide range of suppliers, the business sectors in which Aon operates are low risk for slavery and human trafficking.

# **Actions Taken in FY2024**

## **Governance and Risk Management**

Our global Enterprise Risk Framework serves as the foundation for management of risks facing Aon and its subsidiaries. It sets forth roles and responsibilities and provides the blueprint for the management of supplier-related risk.

## **Supplier Due Dilligence and Onboarding**

Aon's supplier on-boarding controls include due diligence into each onboarded supplier and a risk assessment based on the nature of the products and/or services being procured, enabled by our centralized procurement process.

## **Training and Awareness**

Annual mandatory e-training to help colleagues understand the link between business and human rights and to raise awareness around modern slavery. Training is targeted to colleagues involved in the procurement of products, goods, and services.

## **Reporting Channels**

Aon has a dedicated <u>ethics helpline</u> to encourage Aon personnel and third parties to confidentially raise and report any concerns. If Aon suspects or becomes aware that an existing supplier is in breach of modern slavery legislation, Aon will investigate and, if appropriate, report the matter to the relevant authorities. Aon will also assess whether to continue its relationship with the supplier in question.

<sup>&</sup>lt;sup>1</sup> Additional modern slavery practices and processes relevant to Aon Australia are outlined in the Appendix.



# **Codes of Conduct and Policies**

The following section describes the ongoing steps we have undertaken to mitigate modern slavery risks within our firm and supply chains through our codes, policies, processes and procedures:

- <u>Code of Business Conduct</u> We have zero-tolerance for modern slavery in our supply chains
  and business. This position is reflected in our Code of Business Conduct, which sets the
  minimum standard of conduct for all Aon colleagues, including contractors. The Code of
  Business Conduct is designed to promote a culture of transparency, honesty and fairness, and
  is aligned to our Supplier Code of Conduct, which is incorporated in all Aon supplier contracts.
- Supplier Code of Business Conduct Our Supplier Code of Business Conduct sets our requirements and expectations of our suppliers regarding sustainability, human rights, inclusion and ethics. The Supplier Code of Conduct is made available to prospective and existing suppliers.
- <u>Human Rights Statement</u> Aon is committed to respecting human rights wherever we do business, and we have designed our governance frameworks accordingly.

### **Ongoing Commitment**

We will also continue to review and improve policies, risk indicators and our practices to ensure they remain relevant and effective in our business and supply chains.

## Consultation process with any entities that Aon owns or controls

We have prepared this Statement on a consolidated basis for Aon. Our consultation process involved our central Procurement, Legal, and Compliance functions that operate across the group. We have worked with global operations to ensure that policies and practices are aligned to comply with all applicable modern slavery laws.

This Statement covers the entities set out in the Appendix attached.



# **Appendix**

Aon plc's Global Modern Slavery Transparency Statement and this Appendix apply to the following entities:

Aon Corporation Australia Limited ABN 58 004 756 772, Aon Risk Services Australia Ltd ABN 17 000 434 720 (general insurance broker); Aon Hewitt Financial Advice Ltd ABN 13 091 225 642 (financial advice); Aon Reinsurance Australia Ltd ABN 79 003 026 668 (reinsurance broker); Aon Superannuation Pty Ltd ABN 83 057 982 822 (superannuation); Aon Services Pty Ltd ABN 96 116 871 473; Aon Product Design & Development Australia Pty Ltd ABN 55 136 905 845 (product design and development); Aon Advisory Australia Pty Ltd ABN 50 068 620 771 (human resources, consulting services, benefits administrations and business process outsourcing); HIA Insurance Services Pty Ltd ABN 84 076 460 967 (general insurance broker representative); One Underwriting Pty Ltd ABN 50 006 767 540 (underwriting agency); Aon Charitable Foundation Pty Ltd ABN 68 065 177 595 (charity); Affinity Risk Partners (Brokers) Pty Ltd ABN 15 091 944 580 (general insurance broker); Aon Risk & Asset Management Pty Ltd ABN 51 629 413 314 (trustee); Cut-E Australia Pty Ltd ABN 81 118 245 597 (consulting).

## **Aon Australia Business Operations**

Aon businesses operate in Australia through over 40 branches located in all Australia states and territories, and through the following key business entities and relevant to them activities:

- Aon Risk Services and their authorised representatives provide insurance broking services, consulting and advice on how corporate, commercial; government, small business and consumers can mitigate their exposure to risks;
- Aon Reinsurance provides reinsurance advice to insurance companies on how best to protect their balance sheet by transferring risk for catastrophic events; and
- One Underwriting, acting as a Managing General Agent of a number of global insurance carriers to transact insurance business under a delegated authority, providing industry specific and product specific solutions.

Our key supply chain relationships include suppliers both locally and globally from the following service sectors:

- Information, Communications and Technology
- Financial and Professional Services
- Property Services/Facilities
- Corporate Travel and Entertainment
- Human Resources
- Marketing, Advertising and Printing Services
- Office Support and Administration

Aon Australia has assessed our operational environment and business structures and do not consider that we operate in sectors that are considered high risk in relation to modern slavery and human trafficking.

# **Risk Management Processes**



Aon Australia risk management processes are aligned with the Aon Global Enterprise Risk Framework that is used as a blueprint for the management of supplier-related risks. As part of those processes, we assess our operational environment and business structures across the globe in order to identify a number of risks that may involve or relate to modern slavery and human trafficking. These risks are:

- Geographical risk: we assess geographies where there is a high level of corruption, weak legal systems, presence of conflicts, internal displacement of people, high cross-border migration and economic instability.
- Sector and industry risks: we analyse sectors and industries where exploitative labour practices
  are more likely to exist, and which are inherently riskier in terms of the known incidence of
  slavery in relation to certain business activities.
- Products and services risks: we review our suppliers and partners' business models and risk
  management practices to ensure the products and services utilised by Aon exclude
  exploitation of vulnerable workers, including forced labour, child labour, or debt bondage.

We have taken actions to assess and address the above risks by focusing on the following four areas: supplier due diligence and onboarding, training and awareness, reporting channels, and policies, processes and procedures.

# I. Supplier Due Dilligence and Onboarding

We rely upon our suppliers to provide us with products and services to meet a range Aon' strategic and business needs. We recognise that this introduces a variety of risks to Aon, and that we are accountable for assessing, managing and monitoring those risks. Our approach to the supplier risk management is designed to ensure that all suppliers are appropriately and effectively sourced, contracted, managed and on-boarded. As part of the supplier on-boarding process, we ask our suppliers to complete the Modern Slavery and Human Trafficking Due Diligence Questionnaire that helps us to assess and identify any exposures to the modern slavery risks in our supply chain.

Where we identify that a supplier has failed to comply with our policies and the Code of Business Conduct, or an unsatisfactory response to the above questionnaire, we will work with the supplier to remediate any issues through a corrective action plan in line with our remediation framework. We also work with our suppliers to improve their awareness of modern slavery risks and how they may contribute to modern slavery through awareness-raising of their own business operations.

## II. Training and Awareness

In line with our global practices, Aon Australia colleagues are required to undertake the Aon Code of Business Conduct on an annual basis. The Code educates employees on grievance processes and how to identify and report behaviour that is not consistent with Aon Values. We also have an annual mandatory e-training to help colleagues understand the link between business and human rights and to raise awareness around modern slavery. Training is targeted to colleagues involved in the procurement of products, goods, and services. Information and tools related to modern slavery risks are also available to all colleagues via Aon intranet site.

# III. Reporting Channels

In addition to our global reporting channels, Aon Australia has its Whistleblower policy that is aligned with the Aon Code of Business Conduct. The policy emphasises the importance of speaking up as a critical component of our culture. The policy establishes a framework for how Aon complies



with obligations regarding whistleblowers, including that all disclosures made through this channel are protected, assessed, investigated and reported. This policy applies to all Aon colleagues, as well as contractors and suppliers.

We also encourage our colleagues and partners to use a stop-line whistleblower hotline that provides an externally managed telephone, email and mail service. The service is set to enable our colleagues to raise issues impacting their roles and responsibilities, wellbeing, and/or Aon businesses more broadly. It exists to provide a safe mechanism to raise issues without a fear of reprisal.

## IV. Policies, practices and processes

Aon Australia colleagues are expected to adhere to all global and local policies. Aon Australia policies and procedures relevant to the modern slavery are:

- Whistleblowing policy and procedures, that encourage our colleagues and suppliers to report any concerns including modern slavery and any other human rights violations;
- Procurement Policy, which sets out the minimum requirements in respect of any procurement, selection and on-boarding of new suppliers; and
- Remediation framework, that allow us to work with suppliers to remediate any identified issues through a corrective action plan.

These policies support the following processes in our business:

### **Remediation processes**

We recognise that the intent of the modern slavery act is for reporting entities and suppliers to work together to reduce their modern slavery risks. It supports our engagement with suppliers in an open discussion on the findings, exploring root causes, and assisting them with the development of specific improvement actions. We work with our suppliers to review and assess their progress in implementing remediation activities and to provide further guidance if required.

## **Ongoing certifications**

We may also require specific information from suppliers from time to time to confirm compliance and provide certifications, where appropriate, that materials used in goods, whether acquired directly or indirectly, are from a source that does not use forced or involuntary labour and is not involved in human trafficking.

## **Ongoing commitment and effectiveness**

We assess the effectiveness of our modern slavery risk controls on ongoing basis in the following ways:

- Through assessing and monitoring of our colleagues' learning and awareness;
- Completion of modern slavery questionnaire by all our suppliers;
- Internal monitoring of our governance, procurement and incident management processes; and where a supplier is implementing a remediation plan, upon completion, we may conduct an audit to reconfirm the satisfactory completion of such plan;
- Collaboration with our clients, partners and industry associations to increase our knowledge and to promote effective actions to find, fix and prevent modern slavery, labour exploitation and human trafficking; and



 Through our commitment to continue improving Aon policies and procedures including ongoing improvements of risk assessments and practices to ensure they remain relevant and effective in our business.

Aon plc's Global Modern Slavery Transparency Statement and this Appendix has been approved and adopted by the Aon Corporation Australia Pty Limited Board, which is the holding company of all operating Aon entities in Australia.

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Kevan Johnston

CEO, Aon Australia