

# Vanguard Australia Modern slavery statement

June 2023



Vanguard condemns slavery and abuses of human rights.

We are committed to proactively monitoring and mitigating the risk of modern slavery and human trafficking practices within our investment portfolios and supply chains.

This statement provides an overview of how we address this risk across our business, and outlines the actions we took to manage the risk of modern slavery exposure in our operations during the 2022 calendar year.

## Important Information

This Modern Slavery Statement (**Statement**) is made on behalf of Vanguard Investments Australia Ltd ABN 72 072 881 086 (**Vanguard, Vanguard Australia, VIA, we, us or our**) describing actions that were undertaken to assess and address modern slavery risk exposures during the 2022 calendar year. Our Board of Directors is responsible for the oversight and approval of our Statement.

This Statement's scope reflects Vanguard Australia's role as a provider of managed investment products and services in Australia. There are no other entities that Vanguard Australia owns or controls.

This Statement may reference events occurring after the end of the reporting period. Where statements are made of current intention, opinion and predictions as to possible future events, these statements are not fact and there can be no certainty of outcome in relation to the matters to which the statements relate.

Forward-looking statements involve known and unknown risks, uncertainties, assumptions and other important factors that could cause the actual outcomes to be materially different from the events or results expressed or implied by such statements, and the outcomes are not all within our control. Statements about past performance are not necessarily indicative of future performance.

## About Vanguard

Vanguard Australia is a wholly owned subsidiary of The Vanguard Group, Inc. (**VGI**) – one of the world's largest global investment management companies.

In Australia, Vanguard has been serving retail clients, financial advisers and institutional investors for more than 25 years.

The Vanguard Group, Inc. is owned by Vanguard's US domiciled mutual funds, which in turn are owned by the investors in those funds. Vanguard's unique structure aligns our interests with those of our investors – benefiting investors worldwide – and drives our organisation's culture, philosophy, policies and practices.

Our core purpose is *'To take a stand for all investors, to treat them fairly and to give them the best chance for investment success'*.

## Our Operations

Vanguard Australia's core activity is investment management. Our supply chains include vendors providing trade execution, clearing and settlement services, providers of electronic trading platforms and suppliers of market data, office supplies, office space, consulting services, IT services and infrastructure, storage services and rating services. More information about Vanguard Australia can be found at [www.vanguard.com.au](http://www.vanguard.com.au)

## Our Approach to Modern Slavery Risk

At Vanguard, we consistently seek to earn and maintain the trust and loyalty of our investors by adhering to the highest standards of corporate ethical behaviour. We conduct ourselves in accordance with all applicable law and regulations, and the standards of conduct as set out in Vanguard's Code of Ethical Conduct (**the Code**). The Code has been approved and adopted by the Boards of all Vanguard's entities, including Vanguard Australia.

We take a risk-based approach in respect of the mitigation of modern slavery related risks associated with our business, supply chains and crew (**Vanguard employees**).

We consider that, as our business is extensively regulated and does not have complex supply chains, the risk of modern slavery and human trafficking occurring within our supply chains, business operations and human resources is relatively low, though still requiring active vigilance and sound processes to successfully manage.

In the latter part of this Statement, we summarise how these internal risk exposures are addressed in our supply chain management, procurement, recruitment and staff training practices.

We acknowledge, however, that as a large institutional investor with extensive portfolio holdings around the world, modern slavery risks are present within our investment holdings.

The following section addresses how we identify and address these risks from our perspective as a responsible investor and steward of our clients' assets.

## **Our Products**

Vanguard Australia offers equity, fixed income and multi-sector unlisted managed funds and exchange traded funds. Each of these is supported by a portfolio management team which is either internal to Vanguard or through an agreement with an external investment manager. Through the application of our various processes including our approach to investment stewardship, we actively identify and address modern slavery risks that are present in the underlying entities in which our funds invest.

Vanguard offers several equity and fixed income products tracking indices that exclude exposure to companies that do not meet specific socially responsible criteria related to the environment, human rights, health and safety, labour standards or diversity. These products also exclude index constituents that are or have engaged in activities that result in serious violations of the United Nations Global Compact (UNGC).

Where Vanguard uses external investment managers for portfolio management, environmental, social and governance (ESG) considerations are integrated into their investment processes.

## **Our Investment Stewardship Program**

Based on the fund choices made by Vanguard's investors, the majority of Vanguard's global assets under management are held in index funds that are designed to track broad market indices. This approach is fundamental to our ability to deliver efficient, low-cost access to market returns to tens of millions of investors globally, and to give our investors the best chance of investment success.

This investment approach means that Vanguard's funds may be indirectly exposed to modern slavery risks through the operations of the public companies in which the funds invest.

Vanguard addresses these risks through its Investment Stewardship program, which is responsible for portfolio company engagement and proxy voting on behalf of Vanguard's internally-managed equity funds. Investment stewardship activities, including proxy voting, for Vanguard's externally-managed funds are supported by those funds' investment managers.

The Investment Stewardship team engages with the boards and executive management teams of portfolio companies to understand how they oversee long-term strategy and material risks to the long-term value of our funds.

The Investment Stewardship team comprises approximately 60 professionals located in the United States, United Kingdom, Ireland and Australia. The team employs a regionally focused model. All engagement, company research, analysis and voting activities are overseen by senior leaders responsible for particular regions and markets. These leaders, and a dedicated team of analysts, who are further aligned by sector, maintain responsibility for their respective coverage areas.

Our Investment Stewardship program is communicated to clients, portfolio companies and the other market participants through materials published on our websites, including:

- Annual and Semiannual Reports, detailing engagement and voting activities, including case studies;

- Periodic commentary focusing on particular themes, votes and topics across the spectrum of ESG issues; and
- Disclosure of the internally-managed equity funds' proxy voting on a quarterly basis in arrears, accessible and searchable by country, company or Vanguard fund.

### **Approach to Human Rights**

Vanguard condemns crimes against humanity and abuses of human rights. The internally-managed equity funds have an established procedure to identify and monitor portfolio companies whose involvement in crimes against humanity or activities rise to a level of abuses of human rights that may warrant actions on behalf of the funds. We believe our approach effectively integrates our commitment to our fiduciary obligations.

The Investment Stewardship team is responsible for identifying and monitoring the human rights practices of the internally-managed equity funds' portfolio companies. The team's approach begins with analysis of third-party research based on the United Nations Global Compact. The team uses both proprietary research and external data sources to identify human rights risks within the funds' portfolio companies. From this starting point, the severity of the impacts of a company's operations on human rights, including whether the alleged violations were intentional or if the company is deemed to have mismanaged risks that led to the allegations, is assessed.

As part of their analysis, the Investment Stewardship team may seek to engage with a company's board members to understand the board's oversight of alleged human rights violations. Through engagement, the team may be seeking to understand whether a company has launched an investigation into the allegations, consulted with experts, enhanced human rights policies and disclosures, remediated the allegations and/or mitigated the risk. Engagement provides an opportunity for companies to share demonstrable changes to their human rights risk oversight process; in these cases, Investment Stewardship continues to monitor the situation.

The Investment Stewardship team looks for progress by a portfolio company if concerns have been expressed on a specific governance matter. Failure to respond to shareholder feedback on material risks or continued poor governance practices may result in escalation of the matter to the global Investment Stewardship Oversight Committee and the funds' boards for further guidance. If improvements are not made, the funds' boards will take appropriate actions – with the input of relevant investment professionals – that are in the best interests of each fund.

This escalation approach provides flexibility to take actions relevant for each specific situation, such as direct company engagement, voting in support of a relevant shareholder resolution, withholding support for relevant directors and/or voting against the board of directors, outreach from the Investment Stewardship Officer, sharing our perspective on the matter publicly, or recommending the funds' boards take action to have some or all funds restrict purchases of, or divest from, a company's security.

The global Investment Stewardship Oversight Committee and the funds' boards assess each potential human rights violation case-by-case and implement the measure or measures that they believe are appropriate to each situation.

### **Human Rights Activity in 2022**

In 2022, Vanguard engaged with board members and management of 73 companies to assess their oversight and mitigation of human rights risks. These engagements covered different regions and industry sectors and focused on how companies are managing human rights risks related to health and safety, labour practices, indigenous rights, involvement in conflict regions, allegations of forced labour in the supply chain and more.

Below we have provided case studies, originally published in the 2022 Investment Stewardship Semiannual Report and 2022 Investment Stewardship Annual Report, which describe the Investment Stewardship team's engagement on modern slavery risks in some portfolio companies.

# Case Studies

## **Social risk management is a topic of discussion with Foxconn**

Hon Hai Precision Industry (trading as Foxconn) is a Taiwanese multinational contract electronics manufacturer and one of the world's largest electronics producers.

For a number of years, Foxconn has faced controversies related to labour rights and working conditions. The 2022 Semiannual report discussed a Vanguard Investment Stewardship engagement with Foxconn in February 2022 that focused on the board's risk oversight role, particularly on social issues, and how the company was planning to make progress in monitoring those risks. The company also described planned disclosure of additional information related to environmental, social and governance matters.

In December 2022, the team followed up to discuss and provide feedback on Foxconn's newly published ESG report and to understand issues related to a COVID-19 outbreak in one of its factories in China. The conversation focused on enhanced reporting on the company's social risks and policies and practices. The team was encouraged to see that the company disclosed short- and mid- to long-term goals related to social risks and added more detailed information about audits of key risks. They acknowledged the company's plan to expand audit coverage beyond direct suppliers and shared that they would also appreciate increased disclosure around identified shortcomings and how Foxconn determines whether risks are nonsystemic or resolved.

The Investment Stewardship team learned about the company's response to labour disruption stemming from a COVID-19 outbreak in its Zhengzhou factory. Under the Chinese coronavirus regulations at the time, workers who contracted the virus had to be quarantined, which led to clashes with security and local police. The company explained that once it became aware of how the situation deteriorated, it collaborated with the local government on how to proceed. The company explained how the board of directors responded to the situation. Understanding the context of the matter was helpful, and the team was reassured to learn that incidents and emergencies are directly monitored by the board. In both engagements, the team

recognised the complexity of monitoring the treatment of more than a million employees and a complex supply chain. They welcomed the company's frank communication about the challenges it faces and the improvements it seeks to make. The Investment Stewardship team felt more robust disclosure of risks and objectives related to operations and supply chain is a positive development and will continue the dialogue with Foxconn.

### **Allegations of forced labour at Sime Darby Plantation**

Ahead of its 2022 annual meeting, the Vanguard Investment Stewardship team engaged with leaders at Sime Darby Plantation Berhad (Sime Darby Plantation), a Malaysian integrated plantation company and one of the world's largest palm oil producers. The discussion focused on the company's response to allegations of forced labour.

In April 2020, a nongovernment organisation raised allegations to U.S. Customs and Border Protection (CBP). In December 2020, the agency issued a Withhold Release Order against Sime Darby Plantation, leading the U.S. to detain palm oil and products containing palm oil produced by the company. In January 2022, CBP issued a Notice of Finding that there was enough information to support the allegation that the company and its subsidiaries were using forced labour on its Malaysia plantations; this allowed CBP to seize products from the company at U.S. ports.

In February 2022, Sime Darby Plantation said in a statement that the issue was its management's and board's top priority. It said it was working to address lapses in governance and outlined various initiatives to remediate the issues. The company subsequently submitted a report to CBP outlining how it complied with U.S. import regulations and international labour standards.

The Investment Stewardship team's meeting with Sime Darby Plantation's chief financial officer and the head of sustainability focused on the progress of remedial action, measures that the company has taken to improve its labour practices, and the board's oversight of labour rights risk. The board's Sustainability Committee has been tasked with overseeing efforts to remediate the labour issues and strengthening the overall

governance mechanisms for human rights. As part of the immediate response to CBP's actions, the company audited its operating units in Malaysia to ensure that it identified all potential issues that could have triggered the allegations of forced labour.

The company said this was difficult because it lacked details of the specific allegations, and also because of the size of its operations as well as COVID-19 restrictions that were in place. Sime Darby Plantation said the key allegations—including restriction of workers' movement, debt bondage and withholding of wages—had been addressed. The company explained that it has a policy to prevent foreign workers from having to pay fees to recruiters, but that it had learned that this may have unknowingly affected some workers. Sime Darby Plantation had paid back nearly all current foreign workers and is in the process of identifying and reimbursing former workers, dating back to 2018, who may also have been affected.

When asked how the ban and allegations were affecting the company's business prospects and how it was evaluating the financial materiality of the issues, in particular the CBP action, the company said that it considered these short-term issues and that, thus far, its direct customers were not necessarily moving to competitors. It acknowledged, though, that the CBP action would become more financially material if it continued. The company expressed its determination to work with CBP to address concerns.

Following the meeting, the Investment Stewardship team considered whether the Vanguard funds should withhold support for the re-election of board directors given the seriousness of the issues and the company's seemingly slow response to the allegations. The team ultimately decided to support all board candidates at the annual meeting, given the assessment that the company was taking appropriate action to remediate the issues. The team committed to speak with Sime Darby Plantation again the following year to monitor progress and explore its management of material environmental risks, such as deforestation.

## **Human rights risk at Sturm, Ruger & Company, Inc.**

Sturm, Ruger & Company, Inc. (Ruger), is a U.S.-based company engaged in the design, manufacture and sale of firearms. The Vanguard Investment Stewardship team engaged with company leaders and the lead independent director in advance of their 2022 annual meeting to discuss a shareholder proposal that requested a human rights impact assessment.

The proponent of the proposal argued that, as a firearm manufacturer, Ruger is exposed to elevated human rights risks and that the company's existing human rights policy insufficiently addressed these risks. The team evaluates proposals of this nature on a case-by-case basis to understand how boards oversee human rights risks, oversee mitigation efforts to any identified risks, and provide appropriate disclosure where material risks are present. The Investment Stewardship team does not seek to dictate company strategy or day-to-day operations.

In this case, the potential reputational, legal and regulatory risk posed by illegal use of firearms is real, but also widely known. While the shareholder proposal focused on this material risk, Vanguard's Investment Stewardship assessment saw Ruger's current disclosure of existing policies and practices provided context for how the board oversees this risk. In addition, the team's engagement with Ruger leadership and the lead independent director reinforced their disclosure of how the company addresses the risk and complies with existing laws and regulations.

Based on the analysis and engagement, the team did not support this shareholder proposal because of the board's existing oversight process, its Risk Committee's remit and the company's current disclosure. They did not believe that the additional disclosure called for by the proposal would meaningfully contribute to shareholders' understanding of the risks the company faces or otherwise serve the interest of long-term shareholders.

## **Increased disclosure at LG Electronics**

During the Vanguard Investment Stewardship team's first engagement with LG Electronics (LGE), a South Korean digital display and home appliance manufacturer, the importance of clear, useful disclosure of material risks was discussed. Company leaders shared their strategy for becoming a global brand, and in that context, the Investment Stewardship team encouraged them to consider more robust reporting on board composition and oversight of strategy and risk, particularly regarding supply chain management. LGE is part of one of the largest conglomerates in South Korea via holding company and minority owner LG Corp (LG). Although many of the entities under the LG umbrella are separately listed with individual boards, they collaborate frequently and share the same corporate values under the "LG Way" management philosophy.

In the engagement, LGE leaders conveyed a considered approach to board composition and dynamics. Vanguard's Investment Stewardship team acknowledged the recent appointment of its first female director and shared their views on how thoughtful board evolution, aligned with strategy, reflects sound governance practice.

During the engagement, there was discussion about how the board governs risks in LGE's supply chain, considering that the company had received allegations of forced labour in its supply chain in China. The Investment Stewardship team appreciated LGE's openness to discuss the allegations and was encouraged by its willingness to inform the team's understanding of the board's governance processes and policies and strong commitments to best practices.

Company leaders also described LGE's strategic direction and risks. The Investment Stewardship team found it helpful to learn about the company's journey from a traditional manufacturer using carbon-based processes to a global, modern-day producer with new capabilities and eco-friendly processes.

The team welcomed the constructive dialogue and look forward to continued engagements with independent board members.



## **Risk management at Sony Group Corporation**

Vanguard's Investment Stewardship team has maintained a productive dialogue with Sony Group Corporation (Sony), an entertainment and technology company, over several years and has engaged on a range of topics from board succession planning to its approach to climate risk.

In 2022, the team had the opportunity to meet with Sony leaders on two separate occasions. They engaged with senior management in October to gain a better understanding of how the company oversees social risks, in particular those related to its complex supply chains. They were encouraged by the company's description of continuous efforts to review the supply chains for risks such as exposure to forced labour, provide training and support to suppliers, and attempt to identify and mitigate the risks by establishing a working group focused on human rights due diligence. The discussion helped to explain the oversight procedures that Sony has put in place to address risks to shareholders.

Given the important role a company's board plays in representing shareholders' interests, the Investment Stewardship team also asked to speak with one of Sony's independent directors. The team has historically experienced difficulty in gaining access to independent directors in Asian markets. They were pleased to meet with an independent director who, at the time of our engagement, was the chair of the Compensation Committee and a member of the Nomination Committee to discuss board composition, the oversight of risk and strategy and executive compensation. The conversation focused on the board's succession planning and on what the board identified as key skills in its board skills matrix. The discussion also covered how the board oversees risk management, including environmental and social risks. Finally, the discussion covered the challenges that the compensation committee faces in establishing a compensation framework appropriate for the variety of business lines that Sony operates.

These two engagements helped to provide a better understanding of Sony's approach to managing material risks both on a day-to-day

operational basis as explained by management and from the oversight perspective of an independent board member.

Vanguard is committed to regularly reviewing its approach to human rights risks, including modern slavery and other labour rights issues. We look forward to continuing to report on the progress of our program in subsequent reports.



## External investment managers

Where Vanguard uses external investment managers for actively managed funds, these managers are responsible for proxy voting and stewardship activity on behalf of the assets they manage. Each manager has proxy voting guidelines that govern their assessment of ESG risks and voting decisions.

Our external manager selection and oversight processes ensure that external investment managers have both the ability and governance practices required to carry out this responsibility in the best interests of the Vanguard funds they manage.

## Our Supply Chains

Vanguard Australia uses external vendors to provide a range of goods and services to the organisation.

### Risk Factors

For the purposes of this Statement, Vanguard has considered a variety of supply chain risk factors, including:

- Country of operation – for example, some suppliers are in countries with higher incidences of modern slavery practices than that experienced within Australia.
- Category of supplier service – for example, we procure facilities maintenance services, which is an industry with known domestic incidences of modern slavery.
- Type of workforce – for example, contingent workers employed across parts of our operations can be at increased risk of modern slavery.

With regard to the above factors, we consider that the risk of modern slavery and human trafficking occurring within our supply chains is low.

## Procurement Framework

Our established procurement framework defines our processes when procuring goods and services from external vendors and incorporates various vendor oversight activities. These processes apply to all crew and are designed to ensure that procurement is carried out in a manner that:

- Mitigates legal, business and financial risks associated with vendor contracts.
- Promotes the highest standards of ethical business conduct.
- Instils client, crew and community confidence in Vanguard.

In 2021, we conducted a review of our supplier contract template to ensure that they remain fit for purpose. The governance and monitoring of our Third-Party Risk Management Policy and practices is overseen by the Vanguard Australia Risk Committee in conjunction with all other key risks identified in our business.

In the case of material, multiple or continuous breaches of its policies, Vanguard may choose to discontinue its relationship with a supplier.

## Our Crew

Vanguard Australia has over 800 permanent and contingent Australia-based crew, the majority of whom are based at our head office in Melbourne, Victoria.

### Recruitment

Vanguard is an equal opportunity employer that seeks to ensure that recruitment is handled with fairness and integrity. All recruitment is conducted in accordance with our Talent Acquisition Policy and Gender Equality Policy. We carry out background checks and preemployment screening during our recruitment process. To ensure that our resources are not used for the furtherance of slavery, we maintain a robust recruitment and onboarding process, which include checks to ensure our crew members are eligible to work in Australia, are not subjected to human trafficking or forced labour, and are paid a fair salary in compliance with all relevant rules and regulations.

We require that contingent worker suppliers comply with all applicable laws relating to or affecting the work to be performed by that

supplier, including all rules and regulations related to equal employment opportunity and immigration, and that the supplier will obtain and maintain all permits, visas, licenses and consents required in connection therewith. We work closely with our labour hire partners to ensure that their rates of pay for contractors provided to Vanguard comply with all relevant rules and regulations.

### **Policies**

Vanguard's policies apply to our executives, crew, contractors and visitors to our work sites. We require crew to comply with our policies and implement them as required. Vanguard takes compliance with its policies seriously and, in the event of a breach, requires its crew to act quickly to take corrective actions as appropriate.

All visitors to our work sites must comply with our Health and Safety Policy.

In addition to compulsory training at the commencement of employment, crew are required to certify annually that they have read and understand Vanguard's compliance policies, including the Code anti-money laundering and workplace discrimination policies, and have disclosed any potential conflicts of interest. Any crew member who breaches such policies may be subject to disciplinary action. Any issues identified in relation to modern slavery will be reported in accordance with Vanguard Australia's policies.

In addition, Vanguard maintains a Whistleblowing Policy whereby crew can raise any concerns regarding unethical behaviour or potential wrongdoing in confidence and without fear of action being taken against them. We also have a hotline for crew to anonymously report any concerns. The Whistleblowing Policy and reporting hotline are explained to crew when they join the organisation and reinforced through training and communication channels.

Vanguard has subscribed to various third-party services to receive regular reporting, alerts, guidance and information with respect to human rights and regulatory violations. Such information is regularly reviewed and promptly acted upon.

### **Training**

Our crew are comprehensively and regularly trained. Crew training enables an understanding of our Risk Management Framework principles and application while working at Vanguard. Vanguard crew are encouraged to identify risks, and, where relevant, report concerns.

Vanguard has implemented risk management training as well as specific modern slavery awareness training for all crew. This training is rolled out as part of each crew member's annual mandatory training program. Our training is continually reviewed and adapted to ensure its relevance and suitability for our crew.

### **COVID-19**

The COVID-19 pandemic has brought further modern slavery and human trafficking challenges and highlighted social and economic inequalities worldwide. Vanguard continues to monitor the impact of the COVID-19 pandemic on its practices and risks to modern slavery and human trafficking, to protect vulnerable workers through this crisis.

## **Governance and Monitoring**

### **Governance**

The Vanguard Australia Board has overall responsibility for Vanguard's Modern Slavery Statement. Our Executive Leadership Team has also been involved in the development and endorsement of this Statement and has responsibility for implementing the objectives considered in this Statement.

### **Monitoring**

Regular review and assessment of the effectiveness of our policies, codes, standards and procedures as part of our Risk Management Framework, combined with the Modern Slavery Working Group and associated oversight and reporting will ensure that Vanguard is able to proactively and assertively address regulatory and ethical obligations pertaining to modern slavery risk management.

### **Key Initiatives in 2022**

During the past year, we have focused on the following key initiatives:

- Maintained a cross-functional working group responsible for identifying and mitigating modern slavery related risks and ensuring compliance with legislative requirements in respect of modern slavery.
- Contributed to the industry submission for the Australian Government's review of the Modern Slavery Act 2018.
- Delivered mandatory Modern Slavery training to all crew in Vanguard Australia. The training is now part of the on-boarding process for new crew, and a component of mandatory annual training and certification for all crew.
- Uplifted our Procurement Framework, ensuring our supplier agreements are fit for purpose and developed an attestation initiative to ensure our suppliers have appropriate measures in place to identify modern slavery risks within their organisation.
- Vanguard's Investment Stewardship program continued to identify and engage with companies exposed to alleged human rights violations and risks.

### **Looking Ahead**

We remain committed to an ongoing assessment of our practices alongside engagement with our crew and vendors to raise awareness and proactively mitigate the risk of modern slavery and human trafficking occurring in our organisation and supply chains.

This Statement was approved by our Board of Directors on 18 June 2023.



**Daniel Shrimski**

Chair of Vanguard Investments Australia Ltd.  
20 June 2023.

# Modern Slavery Act 2018 (Cth) – Statement Annexure

## Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of Vanguard Investments Australia Ltd as defined by the Modern Slavery Act 2018 (Cth)<sup>1</sup> ("the Act") on 18 June 2023.

## Signature of Responsible Member

This modern slavery statement is signed by a responsible member of Vanguard Investments Australia Ltd as defined by the Act .

## Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

MANDATORY CRITERIA	PAGE/S
a) Identify the reporting entity.	3
b) Describe the reporting entity's structure, operations and supply chains.	3–4, 10–12
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	3–4, 10–12
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	3-12
e) Describe how the reporting entity assesses the effectiveness of these actions.	11
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	Do not own or control any other entities.
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	

\* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

\*\* You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

1 Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

2 Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

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