

GRESHAM

Gresham Partners Group Joint Modern Slavery Statement FOR THE YEAR ENDED 30 SEPTEMBER 2025

Gresham Partners Group Limited

Gresham Partners Holdings Limited

Gresham Partners Limited



Introduction and purpose

This modern slavery statement (the “**Statement**”) is submitted by Gresham Partners Group Limited (ABN 75 003 856 933) as a joint statement pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) (the “**Act**”) on behalf of the following reporting entities:

- Gresham Partners Group Limited (ABN 75 003 856 933) (“**GPGL**”);
- Gresham Partners Holdings Limited (ABN 25 002 993 259) (“**GPHL**”); and
- Gresham Partners Limited (ABN 61 003 248 922) (“**GPL**”).

The above reporting entities are collectively referred to as the “**Gresham Reporting Entities**” in this Statement. Each of the Gresham Reporting Entities and their respective controlled entities are collectively referred to as “**Gresham**” or the “**Gresham Group**” in this Statement.

This Statement reports on Gresham’s approach to identifying, mitigating and addressing risks of modern slavery across its operations and supply chains and covers the period 1 October 2024 to 30 September 2025 (the Gresham Reporting Entities’ annual reporting period).

This is the second modern slavery statement submitted by the Gresham Reporting Entities (the first being in respect of FY22 (**the FY22 Statement**)) and reflects the progress made since that first statement, which has resulted in the implementation of Gresham’s Modern Slavery Policy (adopted December 2025).

The Appendix to this Statement details those sections of the Statement which address the mandatory criteria set out in section 16(1) of the Act:

This Statement was approved by the respective Boards of the Gresham Reporting Entities on 19 March 2026 (Gresham Partners Group Limited and Gresham Partners Holdings Limited) and 26 March 2026 (Gresham Partners Limited).



James Graham AM
Chairman

Gresham Partners Group Limited
Gresham Partners Holdings Limited
Gresham Partners Limited

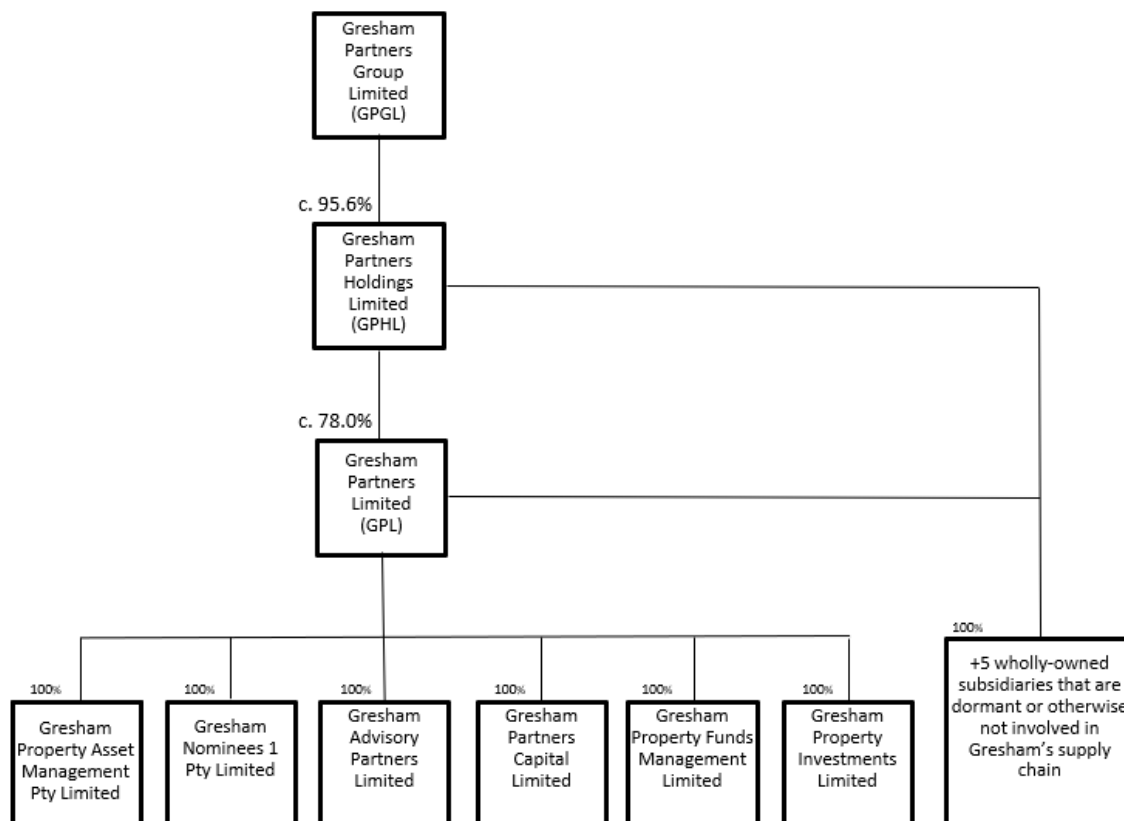
1. About Gresham

Gresham is a leading independent Australian-owned financial advisory, investment and funds management business. We are headquartered in Sydney, with 90 employees spread across offices in Sydney, Melbourne and Perth. The Gresham Reporting Entities are each incorporated in Australia, with their registered offices in Sydney, Australia.

Our corporate structure

The Gresham Reporting Entities are each unlisted public companies governed by boards comprising of executive and non-executive directors and a chairman. GPGL is the ultimate parent company of the Gresham Group and is owned by Gresham Investments Pty Ltd and our foundation co-investor, Wesfarmers Limited (ASX:WES). GPHL is majority owned by GPGL. GPL is majority owned by GPHL. Key Gresham executives hold minority shareholdings in GPHL and GPL.

The Gresham Group also contains eleven operating and non-operating subsidiaries. GPL is the head operating entity of the group, responsible for the employment of all Gresham staff and is the key contracting entity for Gresham's suppliers.



Gresham's key operating entities include three Australian Financial Services Licensees ("AFSL"). Refer below for further detail regarding the operations of our key entities. A number of subsidiaries are dormant or non-operating entities that do not have supply chains and do not undertake any business operations on behalf of the Gresham Group.

The Gresham Reporting Entities' senior management team comprises Gresham's Managing Director, Chief Financial Officer, General Counsel and Chief Business Officer, and Heads of the respective Gresham business

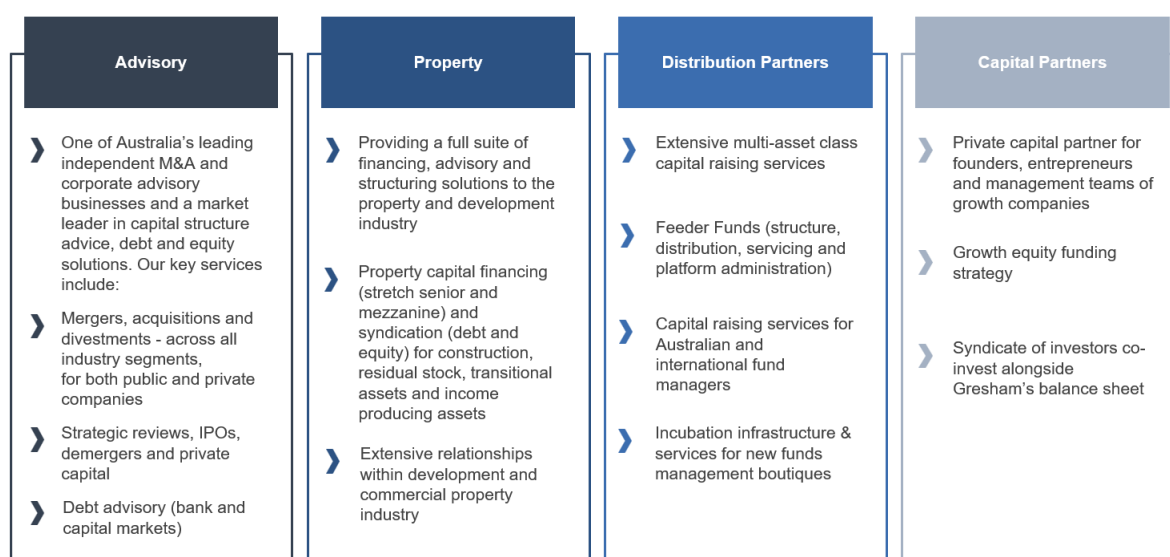
divisions. This senior management team has responsibility for, and oversight across, all entities within the Gresham Group and James Graham AM is the Chair of the Board of Directors of each Gresham Group entity.

In addition, as the main operating entity within the Gresham Group, GPL has established an Executive Committee of senior staff, which meets regularly to (among other things) review Gresham’s risk frameworks, compliance testing and financial performance. This Executive Committee is also responsible for overseeing the performance of the various operating subsidiaries and contains representatives from each of Gresham’s four main business divisions.

There have been no substantive changes to the Gresham Group’s corporate or governance structures since the FY22 Statement.

Our operations

Gresham operates across four main divisions:



Gresham’s business divisions are conducted under the following subsidiaries that are all wholly owned by GPL and are holders of an AFSL:

- Gresham Advisory Partners Limited (ABN 88 093 611 413 / AFSL 247113) – the key operating entity for Gresham’s corporate and debt advisory businesses. Gresham Corporate Advisory is the largest independent M&A advisory business in Australia. Gresham Debt Advisory helps clients achieve an optimal capital structure through accessing global bank and capital markets on the best possible terms;
- Gresham Partners Capital Limited (ABN 62 003 004 279 / AFSL 247110) – the key operating and trustee entity for the Gresham Distribution Partners (“GDP”) and Gresham Capital Partners (“GCP”) funds management businesses:
 - GDP provides funds placement, capital raising and new manager incubation services to Australian and international funds management businesses, including via the establishment and management of Australian wholesale unit trusts (feeder funds) of which Gresham Partners Capital Limited acts as trustee. To date, the business has provided services to a number of offshore investment managers with headquarters in the United States and Europe, including Antin Infrastructure Partners, Blackstone, StepStone Group and GoldenTree Asset Management; and

- GCP is an Australian private equity investor seeking to make investments into Australian and New Zealand based growth companies, via Australian wholesale unit trusts of which Gresham Partners Capital Limited acts as trustee. To date, GCP has made investments into Australian-owned and domiciled businesses in the cosmeceuticals, regulatory technology, motor vehicle accessories, rigid truck body manufacturing and subscription data sectors; and
- Gresham Property Funds Management Limited (ABN 37 092 191 270 / AFSL 247112) (“**Gresham Property**”) – the key operating and trustee entity for Gresham’s property financing business. Gresham Property provides a full suite of advisory, financing and structuring solutions to the property and development industry. Gresham Property provides property capital financing in respect of properties located in Australia only, through three wholesale unit trusts of which Gresham Property Funds Management Limited acts as trustee:
 - GPF No. 6 – provides stretch senior construction financing;
 - GPF No. 7 – provides term debt for residual stock; and
 - GPF No. 8 - provides stretch senior construction financing.

Gresham Property has also acquired (via a wholesale unit trust of which Gresham Property Funds Management Limited acts as trustee) a direct interest in commercial property located in Sydney, Australia.

All investors in or financiers of the Gresham Property, GDP and GCP trusts are professional, wholesale or institutional investors, most of which are located in Australia or New Zealand.

Our supply chains

Gresham’s supply chains are relatively limited. Gresham does not produce or manufacture goods but rather focuses on providing financial services and other professional services to clients and investors. Gresham engages a predominantly domestic network of direct suppliers of goods and services to support its business, primarily through GPL. Gresham’s main supplier relationships and their country of origin are set out in the table in section 2 below.

2. Risks of modern slavery

Our operations

As we noted in our FY22 Statement, Gresham considers that the risk of causing, contributing to, or being directly linked to modern slavery practices within its direct operations is low. Gresham operates within the financial services sector, has a highly skilled workforce and is domiciled in Australia. All of Gresham’s employees are Australian citizens, permanent residents or otherwise have a right to work in Australia and are directly employed by us in clearly structured and documented roles. We operate under local employment laws and comply with Industry Award requirements (Banking, Finance and Insurance). We ensure employees work in safe, professional and sanitary working environments. Our employees are expected to treat each other with respect, operate ethically and with integrity and not engage in any bullying, harassment, discrimination or other unlawful behaviour.

However, we acknowledge that Gresham may be indirectly exposed to modern slavery practices through our supply chain, client relationships or investments. Gresham has no direct knowledge of any instances of modern slavery occurring in any of its outsourced services or procurement of goods and services during FY25. Notwithstanding this, , we recognise the need to continue to maintain our processes for identifying modern slavery risks.

While the majority of Gresham's operations are conducted in-house, certain support functions (for example, registry and fund administration services for certain trusts and some technology support services for the business) are outsourced to reputable, Australian-based providers.

Gresham notes the following:

- Gresham's property financing business provides financing solutions to the property and development industry. Gresham notes that the property and development industries are typically associated with modern slavery risks, including due to a high demand for a low-skilled labour force that can be vulnerable to exploitative practices, business models that often rely on outsourcing, and the use of raw materials that may be sourced from higher risk locations. Gresham notes that its property capital financing is however limited to developments that are based in Australia, which is typically considered a lower risk jurisdiction. As Gresham's involvement in the projects it funds are as a lender only, it has limited insight into the supply chains used in the relevant projects and very limited control over the supply decisions of the relevant developers or builders. Notwithstanding this, the Gresham Property team are required to have regard to modern slavery risks associated with transaction parties as part of its investment due diligence, in accordance with the Gresham Group's Responsible Investment Policy.
- Gresham further notes that modern slavery risks may be indirectly associated with its other sectors of investment, including the cosmeceuticals, motor vehicle accessories and truck body manufacturing sectors, in which our GCP business is invested. Such sectors may be exposed to higher modern slavery risks as a result of the long and complex supply chains involved in producing such goods, and the potential use of low-wage labour for raw materials and components from countries of origin. Gresham's investment in such sectors has been limited to Australian-owned and domiciled businesses. Again, the GCP team are required to have regard to modern slavery risks associated with proposed investments as part of its acquisition due diligence, in accordance with the Gresham Group's Responsible Investment Policy.
- Gresham also notes that there is risk of indirect association with modern slavery risks through our relationships with our advisory clients. Gresham's client onboarding procedures and ongoing client monitoring are, among other things, aimed at identifying clients who may be associated with financial crime (including money laundering) or other unlawful behaviour. Gresham screens clients using a variety of sources and assigns a risk rating to all prospective and existing clients as part of its 'know your client' (KYC) onboarding procedures. Clients identified as being associated with ESG or financial crime controversies may be assigned a high-risk rating and subject to senior management sign-off, enhanced due diligence and ongoing monitoring or other risk management measures.

Our supply chains

Gresham's supplier arrangements range from ad hoc purchases with non-contracted suppliers through to long-term strategic partnerships. We seek to ensure we are not contributing to modern slavery practises by enabling, facilitating or incentivising harm through our supplier relationships. Gresham undertakes commercial due diligence on potential suppliers prior to onboarding to determine their suitability, considering factors such as the reputation of the potential supplier within the Australian market, the scope and suitability of their services, domicile of the potential supplier and the location of its employees.

Given Gresham's relatively small size, we do not have a dedicated supply chain or procurement team and accordingly all new supply contracts with our material suppliers are reviewed and approved by a member of senior management (being the Managing Director, General Counsel, Chief Financial Officer or IT Manager). Existing supply relationships are overseen by a small group of Gresham employees on a day-to-day basis and a supplier register is maintained by the Group.

Gresham is focused on establishing strong relationships with quality suppliers who provide a premium service, rather than sourcing the cheapest possible service – as such, we often consider a number of potential suppliers

before entering into engagements and will only do so with providers that Gresham identifies as reputable. We have documented contractual arrangements with all of our key suppliers.

Gresham has maintained a similar supply chain profile since the FY22 Statement, with no material changes to the products and services we directly procure. Gresham’s main supplier relationships, supplier country of origin and associated modern slavery risks are set out in the table below.

Supplier category	Examples	Supplier location	Associated risks
Professional services	Banking, legal, tax, and accounting services Data and analytics services Registry services IT systems and applications, technical support and cyber security services Corporate insurance policies External funds administration services	Australia United Kingdom United States of America Includes global groups utilising employees in offshore jurisdictions such as India and the Philippines	<ul style="list-style-type: none"> Although Gresham’s direct suppliers are large and reputable professional services providers, risks of modern slavery may still exist in these sectors, especially where employees are engaged on short-term contracts, employed through recruitment agencies, or located in higher risk locations. Modern slavery risks can be linked to certain countries and geographic regions. India and the Philippines are typically associated with a higher level of modern slavery risk.
Facilities / premises management services	Building and facilities management (including cleaning), maintenance services for Gresham premises (electrical, plumbing, air-conditioning etc.)	Australia	<ul style="list-style-type: none"> Potentially higher risk. Whilst Gresham contracts directly with very large and reputable property / leasing management companies, who in turn sub-contract to these suppliers, a risk remains. Exploitation of cleaners, security staff and maintenance workers, particularly through sub-contracting arrangements typical of the industry is widely documented, including in Australia. Migrant works are particularly vulnerable.
Other general office administration services	Office supplies, printers, etc. Post and courier Telecommunications (phone and data) Recruitment	Australia	<ul style="list-style-type: none"> Modern slavery risks can be linked to certain sectors, such as machine/ equipment maintenance, due to the frequent use of low skilled labour and migrant workers and a reliance on outsourcing, creating the potential for worker exploitation. Modern slavery risks may be associated with

	Corporate travel reservations		telecommunications services providers where employees operate from call centres in countries with higher modern slavery risk and weaker labour protections.
Hospitality services	Hospitality and catering services for staff and clients Hotel and accommodation services for staff	Australia Various international locations (staff business travel) – for e.g. New Zealand, United States of America, Singapore, Hong Kong	<ul style="list-style-type: none"> • Hospitality and catering services can rely on base-skilled workers and a high proportion of migrant workers, who are particularly vulnerable to exploitation. • There is also high-risk of exploitation within the hotel sector due to supply chain complexity and use of low-skilled and migrant workers. Hotels frequently rely on agencies to employ outsourced housekeeping and cleaning staff. Multi-tier recruitment systems can mean that it is difficult to detect if an unscrupulous agency is supplying staff who are victims of bonded or forced labour.

As set out in the above table, the majority of Gresham’s direct suppliers are domiciled in lower risk jurisdictions as assessed by the Global Slavery Index. Most of our key suppliers are themselves regulated companies which have:

- made modern slavery statements (in Australia, or their home jurisdictions) which demonstrate their commitment to assessing and addressing modern slavery risks in their operations and supply chains;
- instituted policies and procedures to address modern slavery risks; and/or
- provided contractual undertakings to Gresham to apply with applicable laws, including modern slavery requirements.

Notwithstanding this, Gresham recognises there remains a potential risk of modern slavery in certain industries within Gresham’s supply chain, particularly where sub-contracting arrangements are typical, such as facilities management (including cleaning and security services) suppliers. Facilities management typically utilise third-party service providers such as cleaners and security guards. These services can rely on base-skilled workers and a high proportion of migrant workers, who are particularly vulnerable to exploitation. Gresham has low visibility over the supply chains of these suppliers where (as is typical) such services are provided by direct suppliers such as building management companies (i.e. Gresham’s landlord, as opposed to Gresham itself, will appoint the building and facilities management companies that service our leased office premises). Gresham leases each of its premises in premium and A-grade office buildings that are managed by large, reputable firms (being Brookfield, 101 Collins and Jones Lang LaSalle).

Further, certain of Gresham’s professional services providers (specifically, external legal and accounting firms) utilise staff in offshore locations, such as India, which is a higher risk jurisdiction under the Global Slavery Index.

The modern slavery risk for a professional services firm in these jurisdictions is considered low, as local employees are required to have the requisite levels of professional ability and those firms are themselves regulated financial and professional services companies which have made modern slavery statements or otherwise introduced policies evidencing their commitment towards human rights and addressing modern slavery risks.

As noted above, Gresham has no direct knowledge of any instances of modern slavery occurring in any of its outsourced services or procurement of goods and services during FY25.

3. Actions to assess and address modern slavery risks

Gresham is committed to the highest standards of ethical behaviour in its business practices and conducts its operations in accordance with applicable laws and professional standards. Gresham operates under a set of business principles which focus on integrity, respect and excellence and a commitment to our clients and our people. Gresham does not tolerate slavery, forced labour, child labour or human trafficking in any form and will not knowingly contract with companies who engage in these practices.

We have a comprehensive set of policies and procedures that articulate our values, ways of working and expectations of our team that apply across the Gresham Reporting Entities and are reviewed regularly. This policy framework ensures that our team clearly understand our expectations and can recognize when they are being treated in a way that is inconsistent with these expectations and understand how to raise a grievance or complaint.

The following policies are those that are most relevant to addressing the risks of modern slavery across our operations and supply chain:

Policy	Description
Modern Slavery Policy	The Modern Slavery Policy outlines a structured approach to identifying, assessing, and mitigating modern slavery risks through proportionate due diligence, supplier onboarding checks, contractual protections, ongoing monitoring, and regular reviews. It mandates that all staff comply with relevant laws and internal policies, encourages transparent supplier engagement, and provides clear pathways for reporting concerns through Gresham Legal and the Whistleblowing framework. The Policy also emphasises continuous improvement, staff training, and governance oversight by Gresham Legal, senior management, and the Board to ensure ongoing compliance and ethical conduct.
Business Integrity Policy	The Business Integrity Policy sets out the standards expected of all staff members in the conduct of Gresham’s business. It identifies examples of high risk situations that staff members may encounter, such as bribery, kickbacks, facilitation payments, donations and political contributions and sets out Gresham’s policy and expectations regarding each of those matters.
Whistleblowing Policy	Gresham’s Whistleblowing Policy encourages, protects and supports the responsible reporting of any illegal, fraudulent or unethical conduct involving a Gresham Group entity or its business, including modern slavery concerns in Gresham’s operations or supply chain. Gresham’s Whistleblowing Policy applies to suppliers and third parties providing services to Gresham.
Risk Management Policy	Gresham’s Risk Management Policy has been developed in accordance with ASIC Regulatory Guides and International Risk Management Standards. The key components of the risk framework include Board-approved policies, clearly documented roles and responsibilities, current risk assessment and compliance

	<p>methodologies, monitoring and reporting processes. Effective monitoring and supervision is provided through compliance and internal audit function, compliance plans, and established communication and escalation processes for compliance reporting and complaints handling.</p> <p>Gresham’s legal department also maintains a consolidated Risk Register which identifies the measures taken to manage identified risks and the persons responsible. The Risk Register is reviewed by the Board of each Gresham Reporting Entity and the GPL Executive Committee at their respective meetings.</p>
Responsible Investment Policy	<p>Our Funds Management businesses (including Property, GDP and GCP) also operate under a Responsible Investment Policy that incorporates applicable environmental, social and corporate governance (“ESG”) considerations, including modern slavery risks, into Gresham’s investment processes. In analysing a potential investment, our funds management professionals are responsible for incorporating into the investment process all factors believed to have a material financial impact, which can include but are not limited to those of an ESG nature.</p> <p>As Gresham manages a diverse range of funds across various sectors, ESG considerations will differ for each fund, with each investment team being responsible for ensuring an appropriate integration of ESG analysis (including modern slavery analysis) into their individual investment processes. As a general matter, Gresham will not seek to invest in companies whose core behaviours are in conflict with Gresham’s own commitment to ethical and socially responsible behaviour.</p> <p>Gresham is committed to continually improving our approach to ESG integration, particularly as ESG standards and consideration evolve over time.</p>
Employment Policies	<p>Gresham’s employment practices are governed by a number of policies and procedures that in aggregate set out the business standards for fair pay, working conditions, anti-bullying and promotion of non-discrimination. All Gresham Group entities comply with all relevant employment legislation. Since our FY22 Statement, Gresham’s Compliance Manual for staff has also been updated to include compliance with the Modern Slavery Act 2018 (Cth).</p>

In conjunction with preparing this Statement, Gresham has undertaken a further review of its existing supply chain. Since our FY22 Statement, we have maintained a register of third party suppliers, which was used to conduct the review. Gresham currently has 45 suppliers on this register. The register is used to ensure that appropriate due diligence procedures are undertaken prior to the appointment of a third party supplier and that contractual protections are in place where available. Following the introduction of our Modern Slavery Policy, the Register has been updated to incorporate requirements to address modern slavery risks, including requirements to confirm:

- the sourcing and review of supplier policies and procedures relating to modern slavery;
- whether the supplier is subject to modern slavery reporting requirements; and
- a consideration of modern slavery risks associated with the supplier.

We applied a risk-based approach to supplier review, prioritising suppliers based on a combination of:

- proportion of total spend;

- nature of the goods or services provided and the associated modern slavery risk;
- the supplier’s industry sector and the associated risk of modern slavery in that sector;
- geographic exposure; and
- use of subcontracting or third-party labour.

Using this approach, we reviewed 40 suppliers, representing approximately 75% of our total supplier spend, and covering all key suppliers operating in higher-risk categories.

We reviewed those key suppliers to confirm whether they considered modern slavery risks in their businesses and any measures taken by them to assess and address those risks, including identifying whether they were subject to modern slavery reporting requirements.

The overwhelming majority of Gresham’s key suppliers are from lower risk jurisdictions (as assessed by the Global Slavery Index) and/or are regulated companies that have submitted modern slavery statements that outline their commitment to human rights, and have implemented policies and procedures to address modern slavery risks. A number of our key suppliers have provided contractual undertakings to Gresham to comply with applicable laws, which includes modern slavery requirements.

As noted above, all new supply contracts for the Gresham Reporting Entities are approved by a member of senior management (being the Managing Director, General Counsel, Chief Financial Officer or IT Manager) and appointments will be subject to the requirements of our Modern Slavery Policy and other due diligence considerations that are required by our Supplier Register. Existing supply relationships are overseen by a small group of Gresham employees on a day-to-day basis, which maintains visibility and consistency across those relationships. In some cases, Gresham is able to engage suppliers under arrangements and terms put in place by Wesfarmers Limited (“**Wesfarmers**”), due to Wesfarmers’ ownership interests in Gresham. This allows Gresham to obtain the benefit of Wesfarmers’ ethical sourcing, modern slavery and customer due diligence programs in respect of those suppliers.

Gresham’s review of key suppliers has reconfirmed our assessment from our FY22 Statement, that the risk of causing, contributing to, or being directly linked to modern slavery practices within our direct operations is low. Notwithstanding this low risk level, we will continue to engagement with our suppliers, including through the implementation of our Modern Slavery Policy, to monitor and manage modern slavery risks. We remain cognisant that our key risk exposure is likely to arise from services associated with building and facilities management (including cleaning and maintenance), security and hospitality / catering.

4. Effectiveness assessment

As noted above, since our FY22 Statement, Gresham has enhanced its due diligence procedures in respect of the engagement of new key suppliers, including through updates to our Supplier Register and by ensuring appropriate sanctions screening checks are undertaken prior to the engagement, and requiring potential suppliers to respond to a detailed information security questionnaire. Modern Slavery Risks are also monitored via Gresham’s Risk Register. Along with Gresham’s suite of policies and procedures, and our risk management framework, these steps are providing us with an effective framework by which we can continually assess and manage modern slavery risks in our supply chain. The implementation of our Modern Slavery Policy and the integration of that Policy with our Supplier Register will provide easily identifiable metrics to assist in further monitoring and assessing the effectiveness of the various controls we have in place across our operations.

In FY25 there were no modern slavery incidents (suspected or actual) reported through Gresham’s whistleblowing or grievance channels.

Further actions Gresham may take as it continues to develop its metrics to assess its effectiveness, as well as its general response to modern slavery risks, include:

- continuing to refresh Gresham’s key supplier review on a periodic basis;
- continuing to undertake periodic reviews of our supply chain to assess any changes in our risk assessment;
- following a period of implementation (and then on an ongoing basis as part of our annual policy review), reviewing the effectiveness of our Modern Slavery Policy in identifying and managing modern slavery risks, in conjunction with the other policies described in section 3 above. As noted above, the integration of our Modern Slavery Policy with our Supplier Register (including through the use of a Modern Slavery Questionnaire) will enable us to more easily review and assess the risks associated with our supply chain;
- reviewing adherence to and the scope of our Responsible Investment Policy to ensure it remains effective in identifying modern slavery risks in our Funds Management business and aligns with our client and investor expectations; and
- implementing mandatory training on modern slavery for the Gresham legal department and other staff members involved in the appointment or approval of third party suppliers and increasing employee awareness of modern slavery and capabilities to identify and manage modern slavery risk.

5. Consultation

This Statement was developed by GPGI in consultation with each other Gresham Reporting Entity and the entities that they own or control. Consultation with each Gresham Group entity has been conducted through review of this Statement by the Gresham Group’s Chair and senior management team (comprising the Gresham Group’s Managing Director, Chief Financial Officer, General Counsel and Chief Business Officer, and members of Gresham’s Executive Committee) and the boards of each of the Gresham Reporting Entities.

A copy of this Statement was provided to and approved by the respective Boards of each Gresham Reporting Entity on 19 March 2026 (GPGI and GPHL) and 26 March 2026 (GPL).

Appendix: Mandatory reporting criteria in the Modern Slavery Act

This table outlines where each mandatory reporting criteria is addressed within this Statement:

Section	Mandatory Criteria	Page
Introduction and purpose	Mandatory criterion (a): identify the reporting entity Mandatory criterion (g): include any other information that the reporting entity, or entity giving the statement, considers relevant	Page 2
1. About Gresham	Mandatory criterion (b): describe the structure, operations and supply chains of the reporting entity	Pages 2-5
2. Risks of modern slavery	Mandatory criterion (c): describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Pages 5-8
3. Actions to assess and address modern slavery risks	Mandatory criterion (d): describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Pages 9-11
4. Effectiveness assessment	Mandatory criterion (e): describe how the reporting entity assesses the effectiveness of such actions	Pages 11-12
5. Consultation	Mandatory criterion (f): describe the process of consultation with (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a statement under section 14, the entity giving the statement. Mandatory criterion (g): include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Page 12