

# **Vanguard Australia Modern slavery statement**

June 2025



Vanguard Investments  
Australia condemns slavery  
and abuses of human rights.

This statement provides an  
overview of how Vanguard  
Investments Australia identifies,  
and monitors risks related to  
modern slavery and human  
trafficking practices in our business  
operations and portfolios, and  
outlines the associated actions we  
took to manage the risk of modern  
slavery exposure in our operations  
during the 2024 calendar year.



## Important Information

This Modern Slavery Statement (**Statement**) is made on behalf of Vanguard Investments Australia Ltd ABN 72 072 881 086 (**Vanguard Investments Australia, VIA, We, Us or Our**) describing actions that were undertaken to seek to identify and monitor material risks related to modern slavery during the 2024 calendar year. The Board of Vanguard Investments Australia is responsible for the oversight and approval of this Statement.

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

References in this Statement to "**Vanguard**" refers to Vanguard's global business and therefore includes Vanguard Investments Australia.

## About Vanguard

Vanguard Investments Australia has been serving retail clients, financial advisers and institutional investors for nearly 30 years.

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

VGI is owned by Vanguard's US domiciled mutual funds, which in turn are owned by the investors in those funds. Vanguard's

unique structure benefits investors worldwide – and drives our organisation's culture, philosophy, policies and practices.

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

## Operations

Vanguard Investments 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 Investments Australia can be found at [vanguard.com.au](https://vanguard.com.au).

## Approach to Modern Slavery Risk

At Vanguard Investments Australia, 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 Board of Vanguard Investments Australia.

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

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 investment management company with

extensive portfolio holdings around the world, modern slavery risks are present within our investment holdings.

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

## 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. Vanguard index funds deliver low-cost access to market returns to tens of millions of investors globally.

Vanguard's Investment Stewardship program is responsible for proxy voting and engagement on behalf of the index and quantitative equity portfolios advised by Vanguard (together, **Vanguard-advised funds**).<sup>1</sup> Vanguard's externally managed portfolios are managed by unaffiliated third-party investment advisers, and proxy voting and engagement for those portfolios are conducted by their respective advisers.

Vanguard-advised funds (**the funds**) are primarily index funds managed by Vanguard's Equity Index Group. Vanguard-advised funds are designed to track specific benchmark indexes (constructed by independent, third-party providers), follow tightly prescribed investment strategies, and adhere to well-articulated and publicly disclosed policies. The managers of Vanguard's equity index funds do not make active decisions about where to allocate investors' capital. In other words, instead of hand selecting the stocks in which an equity index fund invests, managers of these funds buy and hold all (or a representative sample) of the stocks in a fund's benchmark index. An equity index fund will generally hold stock in a company for as long as that

company is included in the fund's benchmark index. As a result, Vanguard's equity index funds are long-term investors in public companies around the world. A small portion of the Vanguard-advised funds is managed by Vanguard's Quantitative Equity Group using proprietary quantitative models to select a broadly diversified portfolio of securities aligned with a fund's investment objective.<sup>2</sup>

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.

On behalf of the Vanguard-advised funds, Vanguard's Investment Stewardship team seeks to understand how boards of directors ensure effective governance of the companies in which funds invest. In keeping with the funds' proxy voting policies, the Investment Stewardship team examines how each board is composed to provide for the long-term success of their company, how it consults with management on strategy and oversees material risks, how it aligns executive financial incentives with shareholder returns, and how it safeguards the rights of shareholders.

The Investment Stewardship team comprises more than 60 experienced professionals, located in offices in the United States, Europe and Australia. The team employs a regionally focused model.

Resources on investment stewardship at Vanguard can be found on Vanguard's [website](#), which serves as the primary source of information about our Investment Stewardship program. Vanguard's website contains the funds' proxy voting policies, annual reports, regional briefs, Insights articles, quarterly reports on significant votes and quarterly reports on the companies with which Investment Stewardship has engaged as well as the topics discussed. Details of proxy votes cast by Vanguard-advised funds for the current

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1 Vanguard's Investment Stewardship program is responsible for proxy voting and engagement on behalf of the quantitative and index equity portfolios advised by Vanguard (together, "Vanguard-advised funds"). Vanguard's externally managed portfolios are managed by unaffiliated third-party investment advisers, and proxy voting and engagement for those portfolios are conducted by their respective advisers. As such, throughout this section of the document, "we" refers to Vanguard's Investment Stewardship program and "the funds" refers to Vanguard-advised funds.

2 Vanguard's Investment Stewardship program is responsible for proxy voting and engagement on behalf of the quantitative and index equity portfolios advised by Vanguard (together, "Vanguard-advised funds"). Vanguard's externally managed portfolios are managed by unaffiliated third-party investment advisers, and proxy voting and engagement for those portfolios are conducted by their respective advisers. As such, throughout this section of the document, "we" refers to Vanguard's Investment Stewardship program and "the funds" refers to Vanguard-advised funds.

proxy year are also published on the website, with quarterly updates. The Investment Stewardship team regularly engages with fund investors, portfolio companies, regulators and other market participants to assess how it can best provide materials that are clear and informative regarding our approach to stewarding Vanguard-advised funds.

Examples of Investment Stewardship ongoing reporting include:

- **Annual investment stewardship reports.** These reports outline our global investment stewardship activities and outcomes for the prior calendar year. Each annual report includes summaries of key governance developments we observed in different regions, case studies of company engagements and voting decisions and aggregate regional voting activities.
- **Regional briefs.** These reports highlight the corporate governance topics and trends Vanguard's Investment Stewardship team observed in various markets during a given proxy year.
- **Quarterly reporting.** On a quarterly basis, reports outlining and providing rationale for significant votes are published on Vanguard's website. Reports on company engagements, as well as the topics discussed in the engagement, are also published on our website.
- **Insights articles.** We produce Insights articles to provide explanations of Vanguard's perspectives on important governance matters and the rationale behind certain notable, novel or contentious proxy ballot votes. Vanguard Investment Stewardship Insights are published throughout the year. For example, during 2024, we published our perspectives on governance topics such as Vanguard's approach to climate risk governance and Our executive pay philosophy. We also continued to publish Insights to convey to portfolio companies and investors how Vanguard-advised funds' proxy voting policies were applied for certain votes.
- **Proxy voting policies.** The funds' proxy voting policies are disclosed on Vanguard's website and are updated at least annually.

- **Proxy voting.** The funds' proxy votes are disclosed so that fund investors can see how the funds' policies are applied and how the funds' votes are focused on long-term shareholder returns. We disclose the proxy voting records for Vanguard's global fund lineup through an online tool found on Vanguard's website. The tool provides details of proxy votes cast by all Vanguard equity funds for the most recent proxy year. The vote information for the current proxy year is published quarterly.

## Approach to Human Rights

Vanguard condemns crimes against humanity and abuses of human rights. The Vanguard-advised funds are committed to following relevant laws that may require specific investment restrictions in companies that are sanctioned, including for human rights abuses, and the Vanguard-advised funds' policies are informed by such laws.

The Vanguard-advised funds are primarily index funds that seek to track specific benchmark indexes constructed by independent third parties, and provide diversified exposure to broad, investable markets. By design, managers of index funds do not make active decisions about where to allocate capital.

As described in Vanguard-advised funds' proxy voting policies and in Vanguard Investment Stewardship's public reporting, the Vanguard-advised funds are long-term investors in public companies. Accordingly, Investment Stewardship takes a long-term approach to company engagement and voting proxies on behalf of the funds. The team works to understand how boards of directors identify and oversee material risks, including, but not limited to, material human-rights-related risks. Thus, where human rights matters are not addressed by applicable sanctions laws and regulations that restrict specific investments, Vanguard's Investment Stewardship team employs procedures to identify and monitor material human rights risks at portfolio companies held by the Vanguard-advised funds and to understand how portfolio company boards oversee any such risks.

These procedures include the use of publicly available data and third-party research and serve to help identify and monitor portfolio

companies in which the Vanguard-advised funds invest for potential human-rights-related risks. As part of the Investment Stewardship team's ongoing review, it may seek to engage with company leaders, including company directors, to understand a board's oversight of alleged human-rights-related risks, and if and how the company has mitigated any identified risks.

More generally, Vanguard's Investment Stewardship team reviews how portfolio companies evolve their governance practices and public disclosures over time. In instances where the team does not see that a company has taken steps to address a given governance concern, they have the ability to escalate a matter in a manner appropriate for each situation in consultation with the Investment Stewardship Oversight Committee based on a determination of what is in the best interest of each Vanguard-advised fund that is invested in the company in question.

## Human Rights Activity in 2024

In 2024, Vanguard's Investment Stewardship team engaged with board members and management of portfolio companies to understand 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, involvement in conflict regions, allegations of forced labour in the supply chain and more.

Below are select case studies, included in the 2024 Investment Stewardship Annual Report, which describe the Investment Stewardship team's engagement on modern-slavery-related risks in some portfolio companies.



# Case Studies

## **Board oversight of human-rights-related risks at PT Astra Agro Lestari Tbk**

In May 2024, we engaged leaders of PT Astra Agro Lestari Tbk. (Astra Agro), a palm oil plantation and refinery company based in Indonesia, to discuss board oversight of material risks, including material risks related to human rights. For several years, the company had faced accusations from non-governmental organizations (NGO) of involvement in human-rights-related risks on its palm oil plantations in Indonesia. As such, we sought to understand the company's response to the allegations and learn more about the board's oversight of material human-rights-related risks. During the engagement, the Astra Agro leaders shared how the company's operations are monitored by the board of directors. The company strongly rebutted the claims regarding human rights violations on its palm oil plantations and highlighted compliance with applicable laws and regulations. Astra Agro leaders also described how the company partners with an NGO to assess certain allegations made by third parties and review the plantations in question. Additionally, we discussed the board's processes to oversee material human-rights-related risks as well as the company's response to accusations related to the same.

We highlighted our view on the importance of companies providing clear disclosures of material risks that could impact long-term shareholder returns, including disclosures regarding the board's role in overseeing such risks. Company leaders expressed the company's ongoing commitment to continued efforts in this area, including enhancing corporate disclosures, in the future.



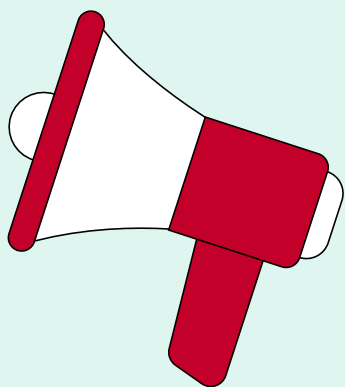
## Human capital risks at Nine Entertainment Co. Holdings Ltd.

At the 2024 annual meeting of Nine Entertainment Co. Holdings Ltd. (Nine), an Australia-listed media company, the funds did not support the election of the chair of the board given concerns related to materialised human capital risks.

Following the departure of a senior Nine executive due to allegations of misconduct, the board disclosed that it had initiated an independent review of Nine's workplace practices and culture by a third-party organizational culture firm, Intersection Pty Ltd. (Intersection). In a publicly released report, Intersection stated that it found that abuse of power, harassment, discrimination, and bullying were prevalent across Nine, with roughly half of Nine employees witnessing or experiencing one of these behaviors within the last five years.<sup>3</sup> The report also discussed Intersection's finding that the workplace culture at Nine exhibited a lack of leadership accountability, power imbalances, gender inequality, a lack of diversity, and significant distrust in leaders at all levels of the business. The investigation occurred during the departure of key executives, including the previous board chair, and resulted in substantial negative coverage across business and mainstream media.

In light of these recent controversies, we requested an engagement with the independent chair of Nine to discuss the board's oversight of company culture and related workplace risks. During the engagement, the chair, who was put forward for reelection by the board, acknowledged the oversight failure and explained that it was predominantly due to a lack of employee reporting, which was attributed to the power structures in place and the abuse of authority by former executives that resulted in a lack of trust in the process. The chair shared that the board believed existing conduct reporting and complaints processes were ineffective, resulting in the failure of information flow to the board needed to adequately identify and oversee human capital matters. To address the workplace culture matters going forward, the board tasked management to form a plan to implement the recommendations included in Intersection's report.

Following the engagement, we continued to have concerns as to whether the board fully understood its role in developing and maintaining an effective organizational culture. We also had concerns about how the board's actions influence company culture and employee conduct at all levels within the business. Therefore, we determined it was appropriate for the funds not to support the election of the chair at the 2024 annual meeting.



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<sup>3</sup> In the last five years, more than half (52%) of Nine employees surveyed had experienced or witnessed abuse of power or authority. Nearly half (49%) had experienced bullying, discrimination or harassment. Source: Out in the Open: Changing the Culture at Nine Entertainment.



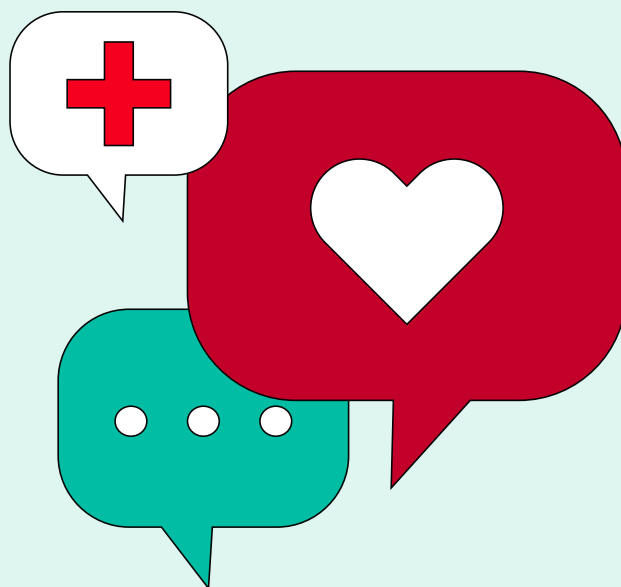
## Board oversight of health and safety risks at ArcelorMittal SA

**ArcelorMittal SA (ArcelorMittal)** is an integrated steel and mining company incorporated in Luxembourg. At the company's 2024 annual meeting, the funds did not support two proposals, one regarding the discharge of directors and one regarding the election of the chair of the Sustainability Committee. The funds did not support the two proposals due to concerns regarding materialized worker health and safety risks.

Prior to the 2024 annual meeting, we engaged with company executives and the lead director to inform the funds' votes on matters on the ballot. In the engagement, we discussed the board's oversight of workplace safety and the steps being taken by the board and management to address and mitigate workplace injuries and fatalities. This was discussed in the context of an October 2023 accident reported by the company that resulted in 46 fatalities at one of its Kazakhstan sites. During our engagement, the company noted steps it had taken related to these matters, including the commissioning of a third-party company-wide health and safety audit.

Following the engagement, we continued to have concerns regarding the board's ability to effectively identify, monitor, and oversee material risks related to health and safety. For this reason, the funds voted against the discharge of directors at ArcelorMittal's 2024 annual meeting. In addition, as the incident in Kazakhstan represented to us a materialized risk related to worker health and safety, and because the company disclosed that the board's Sustainability Committee had responsibility for oversight of health and safety matters, the funds did not support the election of the director who served as chair of the Sustainability Committee.

In the second half of 2024, at the company's request, we had another engagement with members of ArcelorMittal's board. In the engagement, we sought to understand the board's oversight role in implementing the publicly disclosed findings of the health and safety audit. ArcelorMittal directors shared additional information regarding the external audit and the public commitments made by ArcelorMittal and its board to implement enduring reforms following the incident in Kazakhstan.



## External investment managers

Proxy voting responsibilities for externally managed Vanguard funds are conducted by the third-party investment advisers who manage those funds, allowing these firms to fully integrate their stewardship approaches with their unique investment processes. Each external investment adviser Vanguard partners with maintains its own policies and guidelines designed to meet its proxy voting obligations, which are reviewed and approved by each fund's board annually.

Vanguard's external manager selection and oversight processes seek to 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.

## Supply Chains

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

### Risk Factors

For the purposes of this Statement, Vanguard Investments Australia 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; and
- 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, Supplier Risk Profiling and Oversight Frameworks

Vanguard's procurement guidelines define 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 risks associated with supplier engagements, including legal, business and financial risks, and Vanguard's governance and oversight of those engagements;
- Promotes the highest standards of ethical business conduct; and
- Instils client, Crew and community confidence in Vanguard.

As part of this framework, Vanguard Investments Australia's supplier contract template includes terms to manage the risk of modern slavery in our supply chain.

The approach to governance and monitoring of our third parties is defined under the Third-Party Risk Management Policy with compliance to this policy overseen by the Vanguard Investments Australia Risk Committee in conjunction with all other key risks identified in our business.

Vanguard Investments Australia continues to engage with our suppliers to determine adherence to the modern slavery requirements in the countries in which the suppliers operate. In conjunction with our enterprise teams, Vanguard Investments Australia is developing a robust and scalable system to accurately track the adherence of the supply chain to the Australian modern slavery requirements.

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

## Crew

Vanguard Investments 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 Investments Australia 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. 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 includes comprehensive background checks to ensure our Crew members are eligible to work in Australia, 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 us comply with all relevant rules and regulations.

### Policies

Vanguard Investments Australia's policies apply to our executives, Crew, contractors and visitors to our work sites. We have robust policies and procedures concerning employment pre-screening, employment conditions and appropriate workplace behaviours, with review processes in place.

We require Crew to comply with our policies and implement them as required. Vanguard Investments Australia 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.

In addition to compulsory training at the commencement of employment, Crew are required to certify annually that they have read and understand Vanguard Investments Australia's compliance policies, including the Code of Ethical Conduct, anti-money laundering and workplace discrimination policies, and have disclosed any potential conflicts of interest. Under our Code of Ethical Conduct, all our Crew are asked to adhere to the highest standards of ethical behaviour and being steadfast in our principles and speaking up if they see any violations of our code.

Vanguard Investments Australia maintains a Whistleblowing Policy and hotline whereby Crew can anonymously raise any concerns regarding unethical behaviour or potential wrongdoing in confidence and without fear of action being taken against them. The Whistleblowing Policy and reporting hotline are explained to Crew when they join the organisation and reinforced through training and communication channels.

Any Crew member who breaches any of our policies may be subject to disciplinary action. Any issues identified in relation to modern slavery will be reported in accordance with Vanguard Investments Australia's policies.

Vanguard Investments Australia 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 all policies and procedures are amended as needed to reflect changes to employment legislation and regulation.

## 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 Investments Australia. Our Crew are encouraged to identify risks, and proactively report concerns. This includes risks relating to Modern Slavery.

Vanguard Investments Australia has also implemented dedicated modern slavery awareness training for all Crew. This training is rolled out as part of each Crew member's annual mandatory training program, alongside training in anti-money laundering and workplace discrimination policies and a yearly certification of the Code of Ethical Conduct. Training is continually reviewed and adapted to ensure its relevance and suitability for our Crew and evolving legal and regulatory requirements.

## Governance and Monitoring

### Governance

The Board of Vanguard Investments Australia has ultimate accountability for Vanguard Investments Australia'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, assessment and effective implementation of our policies, codes, standards and procedures including our Risk Management Framework, combined with the Modern Slavery Working Group and associated oversight and reporting, will ensure that Vanguard Investments Australia is able to proactively and assertively address regulatory and ethical obligations pertaining to minimising our exposure to modern slavery risks.



## Key Initiatives in 2024

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

- Maintained a cross-functional working group responsible for identifying, monitoring and mitigating modern slavery related risks and ensuring compliance with legislative requirements in respect of modern slavery;
- Continued to deliver mandatory Modern Slavery training to all Crew in Vanguard Investments 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; and
- Vanguard's Investment Stewardship program continued to employ procedures to identify and monitor material human rights risks at portfolio companies held by the Vanguard-advised funds and to understand how portfolio company boards oversee any such risks.

## Looking Ahead

Vanguard Investments Australia remains 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 the Board of Vanguard Investments Australia on 11 June 2025.



**Daniel Shrimski**

Managing Director and Chair of the Board of Directors of Vanguard Investments Australia Ltd.

11 June 2025

This statement has been prepared by Vanguard Investments Australia Pty Ltd (VIA) ABN 72 072 881 086 AFSL 227263. VIA is part of the global Vanguard group which comprises financial product issuers and investment managers around the world.  
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# 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>4</sup> (the Act) on 6 June 2024.

### Signature of Responsible Member

This Modern Slavery Statement is signed by a *responsible member* of Vanguard Investments Australia Ltd as defined by the Act<sup>5</sup>.

### 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 number/s
a) Identify the reporting entity.	3
b) Describe the reporting entity's structure, operations and supply chains.	3-4
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.	3-6
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.	7-12
e) Describe how the reporting entity assesses the effectiveness of these actions.	13
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.

4 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.

5 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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