

GOODMAN FIELDER PTY LIMITED MODERN SLAVERY STATEMENT

2021



INTRODUCTION

Our vision at Goodman Fielder is to make everyday food better for everyone and as a leader in food, we know we that we have a crucial role to play in ensuring that food is a force for good. As well as striving for sustainability in our operations, we are also committed to doing business in a way that is ethical and respectful and ensures that the most vulnerable are protected from exploitation.

This joint Modern Slavery Statement covers the period 1 January 2021 to 31 December 2021 (**CY21**). This Statement will describe the structure, operations, supply chain, risks of modern slavery, actions to assess and address those risks and consultation processes for the reporting entities.

This Statement has been prepared by Goodman Fielder Pty Limited in its own capacity and on behalf of the following entities, which it owns and that are reporting entities under the Modern Slavery Act 2018 (Cth) (the **Act**):

- Goodman Fielder Pty Limited;
- Goodman Fielder Consumer Foods Pty Limited
- Quality Bakers Australia Pty Limited

(Together **Goodman Fielder** or **GF**)

Internal stakeholders of each of the above entities were consulted and have provided input into this Statement.

The Board of Goodman Fielder Pty Limited approved this Statement on behalf of all entities that it owns or controls that are reporting entities under the Act on 29 June 2022.



Kinda Grange
Joint Managing Director



Matthew Albion
Joint Managing Director

Goodman Fielder Pty Limited

OUR STRUCTURE

Goodman Fielder Pty Limited is a privately-owned company, registered in Australia. It is an indirect wholly owned subsidiary of Wilmar International Limited (**Wilmar** or **Wilmar International**), Asia's leading agribusiness group. Goodman Fielder Pty Limited has 37 subsidiaries, operating in 5 jurisdictions (the **Subsidiaries**) and is a leading regional food company across Australia and New Zealand. Operations in Australia and New Zealand include 2 major offices (with associated R&D facilities), 23 manufacturing sites and a network of 94 depots. These operations are supported by a national sales and distribution network in each country. GF also has a small presence in Hong Kong and China.

Goodman Fielder Pty Limited and its subsidiaries share centralised governance, procurement, finance and legal functions together with common policies and procedures. Each subsidiary of Goodman Fielder Pty Limited also shares some common directors.

OUR OPERATIONS

Goodman Fielder manufactures, packages, distributes, markets and sells a wide range of food products in Australia, New Zealand and internationally. Together with our offering of retail and consumer products, GF also services the industrial and food service segments across Australia and New Zealand, including in the hospitality, healthcare, government and military spaces.

Goodman Fielder has a significant portfolio of over 90 brands, including MeadowLea, White Wings, Helga's, Praise, Molenberg, Edmonds and Meadow Fresh. Goodman Fielder's leading product offering is supported by efficient and effective distribution networks that enable delivery to over 30,000 outlets every day including supermarkets, dairies, service stations, cafes and restaurants.

While Goodman Fielder manufactures the majority of its products internally and typically in the market which they are sold, some GF products are manufactured outside of the market and in some instances, by third party manufacturers. To manufacture its products, Goodman Fielder works closely with over 4,000 suppliers globally.

Goodman Fielder employs more than 3,300 people across the Subsidiaries.

OUR SUPPLY CHAIN

Goodman Fielder's supply chain is diverse, with more than 500 direct suppliers and 3,000 indirect suppliers across 40 countries. While most of Goodman Fielder's key ingredients are sourced locally, for example flour, sugar, grains and milk, our broader supply chain extends into Asia, North America, Europe and South America. The top five countries of supply, based on spend for Goodman Fielder are, Australia, New Zealand, China, Germany and Malaysia.

Globally, our supply chain includes the procurement of:

- Raw ingredients;
- Manufacturing equipment and parts;
- Externally manufactured finished goods;
- Packaging;
- Indirect materials such as uniforms and personal protective equipment;
- Maintenance, cleaning and other services;
- Warehousing, linehaul and logistics services; and
- Professional services including IT, recruitment, travel and marketing.

Where feasible, Goodman Fielder endeavours to partner with related entities from the Wilmar International Group. Generally, this provides us with greater oversight of the materials/ingredients being sourced.

IMPACTS OF COVID 19

COVID-19 has had significant and widespread impacts on Goodman Fielder's supply chain and operations, the effects of which are still being felt. Given the nature of Goodman Fielder's business, and its central product offering, demand for GF products increased significantly, particularly during lockdown(s). This put increased strain on Goodman Fielder's manufacturing and operations, which was exacerbated by ingredient shortages, labour shortages, social distancing protocols and site shutdowns. As a manufacturer of daily fresh and essential products (e.g. bread and milk), we played an essential role in keeping communities supplied with many essential food products. Even with this increased demand, Goodman Fielder managed to maintain a steady supply of products for our customers.



MODERN SLAVERY RISKS

Across our supply chain, Goodman Fielder has considered our potential to cause, contribute or be directly linked to modern slavery risks. Across our Australian operations, GF sites completed Supplier Ethical Data Exchange (SEDEX) self-assessment questionnaires and as a result, all sites were assessed as low risk for labour standards contraventions. Separately, we have utilised SEDEX as a tool to review our supply chain risks across our ingredient and bulk commodity suppliers by utilising the Pre-Screen Risk Assessment Tool (Pre-Screen Tool).

The Pre-Screen Risk Tool evaluates suppliers' inherent risk with respect to forced labour indicators, freedom of association, gender inequality, health, safety & environment (HSE), wages and discrimination. The Pre-Screen Tool employs internationally recognised data sets to assess certain risks. Approximately 20 per cent of our overall supply chain has been subjected to this screening and this segmentation exercise has enabled us to prioritise our efforts towards our higher risk suppliers. Generally, suppliers that were rated as high risk were situated in countries that are considered high risk from a modern slavery perspective.

In line with industry insights and following a high-level review of our indirect service providers and commodity suppliers (including use of the Pre-Screen Tool), Goodman Fielder identified certain third-party suppliers as having the highest potential for modern slavery risks. These suppliers include:

- Logistics providers:
- Cleaning providers:
- Third-party labour:
- Cocoa powder;
- Rice; and
- Palm Oil.

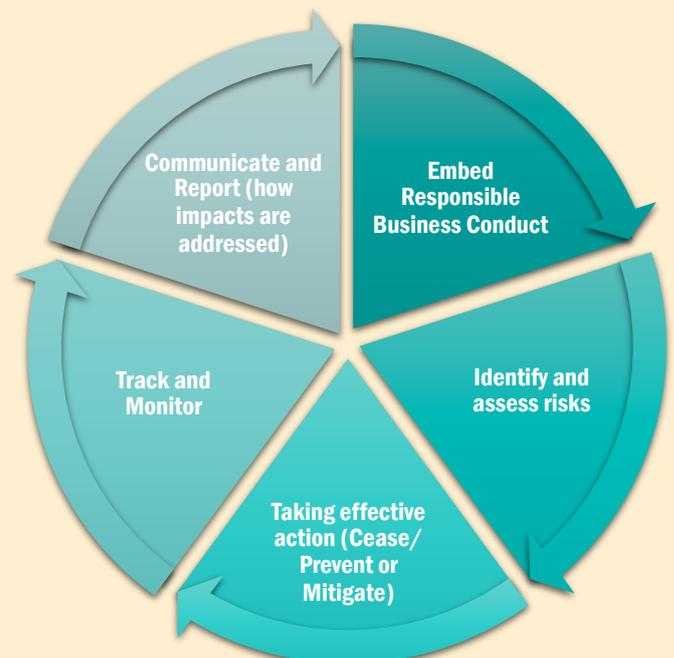
Goodman Fielder has prioritised undertaking a targeted assessment of our third-party suppliers that fall into the above categories in CY22. The intention of this risk assessment is to identify any actual modern slavery risks, with the intention of removing these risks and/or taking specific action to mitigate these risks as required.

KEY ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

Goodman Fielder is committed to supporting and upholding human rights and implementing measures to alleviate modern slavery risks in our operations and supply chain. We are guided by the United Nations Guiding Principles (UNGP) on Business and Human Rights. Specifically;

- A policy commitment to respecting human rights;
- An ongoing human rights due diligence process to identify, prevent, mitigate and account for how the business addresses impacts on human rights;
- Processes to enable the remediation of any adverse human rights impacts the business has caused or contributed to; and
- A process for reporting and continuous improvement.

Figure 1: Our approach to managing modern slavery risks.



KEY ACTIONS

OUR OPERATIONS

Goodman Fielder's focus for CY21 was to build a robust modern slavery framework so that we are prepared to identify and respond to modern slavery risks across our operations and supply chain. To identify and mitigate risks across our operations, GF completed a Sedex Members Ethical Trade Audit (**SMETA**) 4-Pillar, third-party audit against:

- Labour Standards
- Health & Safety
- Environment & Business Ethics

at our largest baking site and revised and updated our SEDEX Self-Assessment Questionnaires (**SAQ's**) at fifteen (15) of our sites (see below).

ACTION ACROSS OUR OPERATIONS

In April 2021, Goodman Fielder's Moorebank site in NSW was subject to a SMETA audit to investigate potential modern slavery risks at the site. The Moorebank site is Goodman Fielder's largest site in Australia, manufacturing 178,000 loaves of bread daily, employing 380 workers across 8 shifts. During the audit, 26 workers were randomly chosen and interviewed. All 26 workers expressed their satisfaction with their employment and the working conditions at the Moorebank site and no indicators of modern slavery were identified.

Fifteen (15) non-conformances (**NC**) were identified at the time of the audit and corrective actions have been implemented for all NCs. Of the 15 NC, seven (7) were site specific Health and Safety (**H&S**) findings. Corrective actions have been implemented and communicated across our national health and safety network. The other eight (8) NCs related to labour hire contracts (labour hire provider(s) and their workers), training on GF Policies and administration. Targeted corrective action has been implemented across the site to address these NCs.

Prior to the audit, the Moorebank site was rated as **Medium Risk** from a SEDEX perspective. However following the audit and the implementation of corrective actions, this risk rating was reclassified to **Low Risk**.

Key corrective actions from this audit, which were adopted across all other GF sites were:

- **Responsible Recruitment:** Labour hire providers were made aware of expectations around the Ethical Trading Initiative (**ETI**) base code. We have also strengthened our contract provisions around social compliance and modern slavery and rolled these out through contract renegotiation and reviews with labour hire providers.
- **Enterprise Bargaining Agreement:** As part of our future Enterprise Agreement processes, each new agreement will be reviewed to ensure compliance with the requirements in the ETI Base code requirements on excessive hours of works.
- **Training:** The on-site training modules were updated to educate on-site staff on Goodman Fielder Policies and Grievance mechanisms.

A subsequent review of all our Self-Assessment Questionnaires (**SAQ**) was completed following this audit, with a focus on the following:

- Accurate information about our workers, labour standards and management systems; and
- Accurately reporting information about worker profiles, wages and union representation.

Following this review, all GF's Australian sites and one New Zealand site have a risk rating of **low** for labour standards risks.

**SEDEX Audit: AUZAA414620997*

KEY ACTIONS

OUR SUPPLY CHAIN

Goodman Fielder assessed our supply chain against a risk framework, which looks at risks such as inherent commodity/material/service risk, source location and category of spend. This exercise has enabled Goodman Fielder to prioritise its efforts towards the highest risk suppliers in our supply chain. In response to this, Goodman Fielder has engaged with some of our suppliers as a matter of priority and used the Supplier Ethical Data Exchange (**SEDEX**) Platform to onboard and audit the social and business practices of these suppliers.

Goodman Fielder is an AB (Buyer/Supplier) member of SEDEX and uses SEDEX as a tool to assess and manage risk across our supplier base.

In FY21, GF worked with our highest value direct suppliers (commodity, ingredient, packaging and third-party manufacturing suppliers) to increase coverage of those suppliers on SEDEX by 55%. Now, 60% of GF's direct supplier spend is represented on SEDEX.

GF is working to increase the number of suppliers we have on SEDEX to include our indirect suppliers and tier 2 suppliers (including our supplier's supply chain). We will do this through collaboration with them, as well as prioritising the onboarding and auditing of suppliers who have been deemed high risk through the Pre-Screen tool.

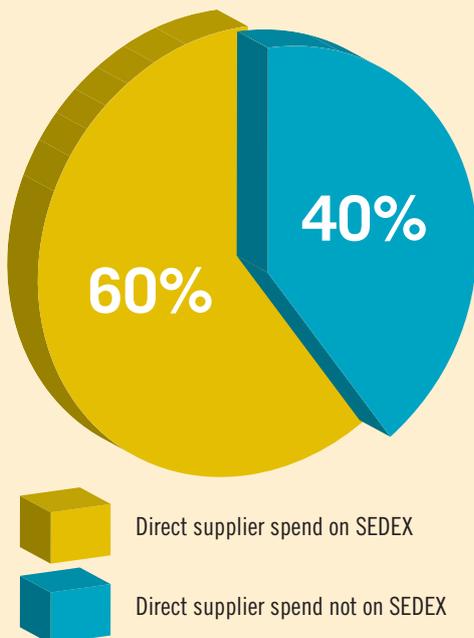
SMETA audits have been completed at 24 per cent of supplying facilities since 2020 and the priority for CY22/ CY23 is to increase SMETA audit completion rates, particularly for suppliers deemed 'high risk'.

Priority will also be given to tracking the status of corrective action plans where non-conformances have been identified.

Strengthening our due diligence process remains an integral part of our mitigation strategy. Key to our approach is working in partnership with our suppliers to ensure that, at a minimum, they understand the importance of identifying modern slavery risks, maintain relevant standards and take ongoing action to mitigate risks.

In CY21, we incorporated Modern Slavery Risk Factors into our **supplier tender elevation platform (Arcus)** and our **Suppliers & External Manufactures Requirements Manual** which new suppliers are audited against.

Direct suppliers on SEDEX by Spend*



SMETA Audit Completion

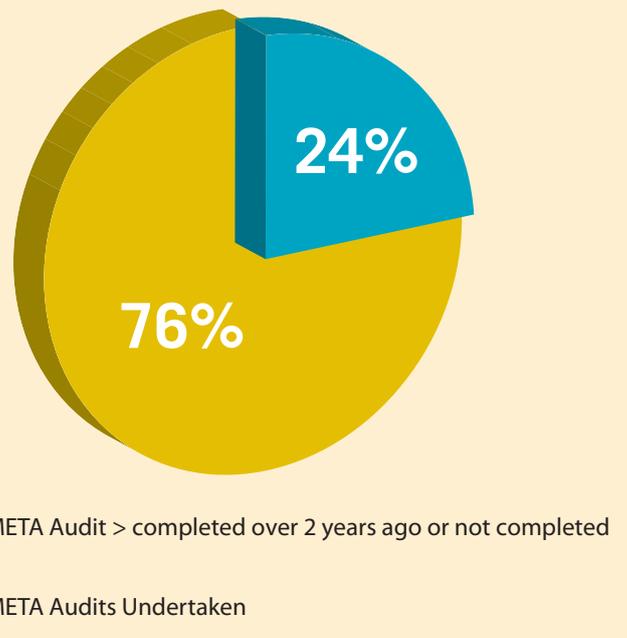


Figure 2: percentage of Direct Supplier spend (Commodity, Ingredient, Packaging and Third-Party manufacturing) on SEDEX.

Figure 3: percentage completion of SMETA audits since 2020.



KEY ACTIONS

FOCUS ON COMMODITY RISKS

Rice

Goodman Fielder does not source directly from primary producers; however, we have made considerable progress in engaging with our rice suppliers in India and Thailand to investigate any instances of modern slavery in the rice supply chain. In FY21, four (4) rice processing and packing sites that GF sourced from were subject to SMETA audits. Three (3) of the four (4) sites reduced their risk rating from High to Medium following the development and verification of corrective action plans. All open non-conformances were closed-out in the reporting year and GF will continue to work with our suppliers to identify potential risks across the rice supply chain.

Cocoa Powder

Godman Fielder procures cocoa powder for use in Edmonds, White Wings and private label products. We ensure our suppliers have policies, procedures, systems and codes of conduct (for their suppliers) in place to manage potential child labour and human rights risks associated with the supply of cocoa. Some of our suppliers have achieved UTZ certification and we are internally reviewing the suitability of the various certification schemes to bring further confidence to the ethical sourcing credentials of our products in this category. In CYY21, a major supplier of cocoa powder was subject to a SMETA audit. Three (3) H&S non-conformances have been resolved since this audit and no modern slavery indicators were identified during the audit.

Palm Oil

GF is a member of the Roundtable on Sustainable Palm Oil (**RSPO**) and supports the production of sustainable palm oil. We are adherent to the RSPO's Principles & Criteria (**P&C**), a set of standards which RSPO members must comply with. The P&C include human rights standards pertaining to good labour practices, responsible recruitment and appropriate wage, which helps support the mitigation of modern slavery risks. In 2014, Goodman Fielder committed to sourcing certified sustainable palm oil (**CSPO**) for all Goodman Fielder products in Australia and New Zealand using the mass balance supply chain model. We have delivered on this commitment, including achieving supply chain certification for all manufacturing sites that handle ingredients containing palm oil. In 2021, GF received zero (0) non-conformances for our annual multi-site certification audit.

FOCUS ON THIRD PARTY SERVICE PROVIDERS

Logistics Providers

GF relies on independent contractors as part of our logistics network. GF's evaluation of risk in this area identified an increased risk of modern slavery, particularly in the areas of working hours, working conditions, wages and workplace health and safety. To combat this, GF has implemented an ongoing monitoring and audit program which seeks to identify and mitigate certain modern slavery risks. In 2021, GF audited 45 independent contractor

KEY ACTIONS

businesses. From this, 96% of contractors were identified as low risk, 2% were identified as medium risk and 2% were identified as high risk. GF has worked closely with those identified as medium and high risk to educate them on labour standards and GF's expectations and developed corrective action plans to reduce their risk rating. One contractor that was deemed high risk and did not take corrective action, was terminated.

Cleaning

The use of unskilled and sometimes temporary labour in this area, together with high labour intensity and low oversight increases the potential for modern slavery risks. To counteract this, GF is in the process of introducing targeted modern slavery clauses into its agreements with cleaning companies and implementing short induction modules at each site, which are intended to educate labour hire personnel on site of potential modern slavery risks and provide them with information relating to GF's grievance mechanism.

Third-party Labour

GF has identified an increased risk of modern slavery among workers who are employed by third-party labour hire companies or through complex labour value chains. Third-party labour hire companies may be contracted to provide operational supports, cleaning or IT services. GF is in the process of introducing targeted modern slavery clauses into its labour hire agreements and implementing short induction modules at each site, which are intended to educate labour hire on site of potential modern slavery risks and provide them with information relating to GF's grievance mechanism.





GOVERNANCE AND POLICES

Goodman Fielder understands the importance of a robust governance system to support our commitment to upholding fundamental human rights. In CY21, Goodman Fielder's first Modern Slavery Working Group was formed, with representation from Human Resources, Legal, Procurements, Risk and Sustainability and sponsorship at the executive level. This Group is responsible for overseeing GF's Modern Slavery Work Program, delivering on GF's Modern Slavery Action Plan and reporting progress and/or concerns to senior leadership.

Goodman Fielder maintains several policies that seek to uphold and protect the rights of our people, both in our own operations and across our supply chain. A priority for CY22 is to develop a stand-alone **Modern Slavery and Ethical Sourcing Policy** to consolidate our position, processes and the systems used to manage and remedy modern slavery risks. During the reporting period, GF ensured consistent application of core policies and across our business.

HUMAN RIGHTS POLICY (WILMAR GROUP)

This Policy applies to all Wilmar subsidiaries (including Goodman Fielder). The Policy draws on guidance from the UN Universal Declaration of Human Rights; ILO Core Conventions on Labour Standards and Food and Agriculture Organization's Voluntary Guidelines on the Responsible Governance of Tenure and covers the following labour rights:

- Freedom of association;
- No forced or bonded labour;
- Prohibition on child labour; and
- Conducive working conditions

NO DEFORESTATION, NO PEAT AND NO EXPLOITATION (NDPE) POLICY AND NO EXPLOITATION PROTOCOL

GF has adopted Wilmar's NDPE Policy which applies to all GF operations. The Policy sets out the core principles which all GF operations must abide by, including:

- Respect and support for internationally recognised human rights;
- Respect and recognise the rights of all workers;
- Respect and protect the rights of children and their welfare; and
- Remediation measures that can be implemented where it is identified that the company has allowed, caused or contributed to negative human rights impacts.

The No Exploitation Protocol is aligned with the OECD Due Diligence Guidance for Responsible Business Conduct and the United Nations (UN) Guiding Principles on Business and Human Rights framework and is designed to “Protect, Respect and Remedy”, with the addition of the promotion of Human Rights within our own operations and supply chain.

ETHICAL EMPLOYMENT POLICY

GF's Ethical Employment Policy sets our expectations on fundamental rights at work including the following labour rights:

- All employees have a written employment agreement;
- Employment is freely chosen;
- No forced, bonded or involuntary labour; and providing reasonable or agreed notice period.

In CYY21 this policy was updated to recognise the provisions of the Ethical Trading Initiative Base Code which sets labour standards based on ILO conventions.



1. Employment is freely chosen



2. Freedom of association and the right to collective bargaining are respected



3. Working conditions are safe and hygienic



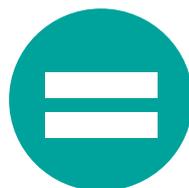
4. Child labour shall not be used



5. Living wages are paid



6. Working hours are not excessive



7. No discrimination is practised



8. Regular employment is provided



9. No harsh inhumane treatment is allowed

FRAUD AND WHISTLEBLOWER POLICY

GF's Fraud Policy sets out our position in relation to fraud, including employee responsibilities, investigation procedures and corrective action. This policy also outlines GF's grievance reporting mechanism - GF Awareline, which is GF's independent whistleblower hotline and covered in GF's Whistleblower Policy. GF Awareline is operated by Deloitte and provides GF employees and third-party service providers with a mechanism to report concerns, issues or instances of suspected unethical or corrupt conduct, including modern slavery. The service provides a number of confidential and secure reporting and disclosure mechanisms, including an option to report grievances anonymously. All reports are handled in strict confidence by the Internal Audit Group and Legal Department of Goodman Fielder and are carefully assessed for subsequent investigation and follow-up action. Goodman Fielder's Whistleblower Policy was most recently updated in 2021.

POLICY ON HUMAN RIGHTS DEFENDERS (WILMAR GROUP)

This Policy applies to all Wilmar subsidiaries (including Goodman Fielder), and articulates that there is no tolerance to threats, harassment, intimidation, the use of violence, retaliation against or interference with the activities of anyone who raises a concern, lodges a complaint or participates in an investigation or whistle blows on activities in our business operations and supply chain, in good faith. This policy follows the principles of the United Nations (UN) Declaration on Human Rights Defenders, Universal Declaration of Human Rights, International Covenant on Civil and Political Rights (ICCPR), International Covenant on Economic, Social and Cultural Rights (ICESCR), UN Declaration on the Rights of Indigenous Peoples (UNDRIP), Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, as well as applicable national legislations and regulations. It is also guided by the UN Guiding Principles on Business and Human Rights (UNGPs), Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct.

RESPONSIBLE SOURCING CODE OF CONDUCT

In CY21 GF reviewed and updated our Responsible Sourcing Code of Conduct (Code of Conduct). It has been strengthened to ensure that modern slavery, human rights, business ethics risk are considered and approaches to each aligned to the UNGP and the ETI Base Code. The revised Code will be rolled-out in 2022/2023, together with updated contract provisions specifically developed to target modern slavery risks and supplier verification measures.

Our revised Code of Conduct outlines the standards and principles that we expect our suppliers (and our suppliers' direct suppliers) to adhere to when conducting business with GF. The revised code details the following requirements:

- Comply with all relevant and applicable laws and regulations in the countries within which they operate;
- Implement systems, processes and controls to:
 - Prohibit modern slavery.
 - Prohibit child labour.
 - Ensure reasonable working hours and wages.
 - Provide a safe working environment.
- Adequately manage grievances in line with the UN Guiding Principles.



GOVERNANCE AND POLICES

The Code of Conduct includes the right to investigate and audit a supplier's conduct and compliance with the code and Modern Slavery Legislation generally in certain circumstances. If Goodman Fielder identifies, or is made aware of, an incidence of modern slavery or human rights violations, Goodman Fielder will engage the supplier's senior management to develop a remediation plan or, in serious cases, may suspend dealings with the supplier. It is Goodman Fielder's intention to collaborate with suppliers to educate them on modern slavery risks and how to alleviate them.

EFFECTIVENESS MEASURES AND CONTINUOUS IMPROVEMENT

Goodman Fielder is committed to developing effective measures to assess the progress and effectiveness of our modern slavery program. We acknowledge that the success of our modern slavery program will be dependent on how we measure the implementation of our planned programs of work and our ability to refine our approach, as necessary.

Goodman Fielder's Modern Slavery Working Group will monitor the effectiveness of our measures through metrics such as:

- Modern Slavery Training completion rates;
- Percentage of high-risk suppliers signed up to Goodman Fielder Supplier Code of Conduct;
- Number of SAQ's completed by current and prospective suppliers;
- Number of SMETAs undertaken, including the number of non-conformances identified and the number of non-conformances resolved within the prescribed period;
- Number of collaborative action plans developed in conjunction with suppliers;
- Number of grievances notified to GF through the GF Awareline, and number of grievances investigated and closed out.

These metrics will be reported on a 6 monthly basis to the Australian Leadership Team (which includes senior executives from Australia) (ALT) and the Board of Goodman Fielder. We intend to review and refine our approach periodically to consider any emerging modern slavery risks.

Goodman Fielder's priorities for CY 2022:

	2022 Action	Effectiveness Measure
Governance and Management Frameworks	<ul style="list-style-type: none"> • Develop and roll out a stand-alone Modern Slavery Policy. • Build our Modern Slavery Governance and modern slavery dashboard for senior leadership • Develop and roll out Modern Slavery Training for Board and Australian Leadership Team 	<ul style="list-style-type: none"> • Modern Slavery Policy developed and rolled out. • Dashboard rolled out and accessible by senior leadership • All ALT and Board of Goodman Fielder have received enhanced modern slavery training
Risk Assessment/ Due Diligence	<ul style="list-style-type: none"> • Expand supplier assessment and due diligence program to next tier of suppliers. 	<ul style="list-style-type: none"> • Number of suppliers that have been audited
Training	<ul style="list-style-type: none"> • Standard and enhanced training programs developed and rolled out across Australian and NZ operations and sites. Enhanced program to be provided to employees that deal directly with suppliers and third parties. • High level training to developed for sites, for third party suppliers to complete. 	<ul style="list-style-type: none"> • Number of employees who have completed the training and number of third-party suppliers that have completed site induction training.
Grievance Mechanisms	<ul style="list-style-type: none"> • Evaluate current grievance mechanism to determine effectiveness 	<ul style="list-style-type: none"> • Number of issues raised versus number of issues closed out • Channels used to raise grievances
Targeted initiatives: Labour Hire/ Cleaning	<ul style="list-style-type: none"> • All labour hire contracts updated to include enhanced modern slavery provisions. • Site induction modules enhanced to include modern slavery training. 	<ul style="list-style-type: none"> • Number of contracts updated. • Number of Labour Hire personnel completed module.

CONSULTATION

Goodman Fielder's Modern Slavery Statement has been developed in consultation with the Senior Executives of Goodman Fielder Pty Limited, each of whom oversees a group-wide function. The Senior Executives were asked to provide feedback on the Statement prior to it being provided to the Goodman Fielder Board, for final review and approval on behalf of Goodman Fielder and its subsidiaries.

APPENDIX I

This Statement was prepared to meet Goodman Fielder's reporting requirements. The table below references where the mandatory criteria set out in the Act are addressed in this Statement.

Mandatory criteria	Location in document
Criteria 1. Identify the reporting entity	Page 2
Criteria 2. Describe the structure, operations and supply chains of the reporting entity	Page 2
Criteria 3. 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	Page 4
Criteria 4. 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	Page 4 - 12
Criteria 5. Describe how the reporting entity assess the effectiveness of such actions	Page 13
Criteria 6. Describe the process of consultation with any entities that the reporting entity owns or controls	Page 14