

TT-Line Company Pty Ltd

Modern Slavery Statement

1 July 2020 to 30 June 2021

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MODERN SLAVERY STATEMENT 2020/2021 – TT-LINE COMPANY PTY LTD

Introduction

This modern slavery statement is for TT-Line Company Pty Ltd (ABN 39 061 996 174) (**TT-Line**). TT-Line owns and operates the Spirit of Tasmania I and Spirit of Tasmania II vessels which provide daily passenger and freight transportation services between Devonport in Tasmania and Melbourne in Victoria.

TT-Line fully supports the aims and objectives of the *Modern Slavery Act 2018* (Cth) (the **Act**). TT-Line is committed to preventing modern slavery in its operations and supply chains. A summary of TT-Line's responses to each of the mandatory criteria in the Act is included in Appendix A of this statement.

In its second modern slavery statement, TT-Line is pleased to report on its continuous improvement to understand, identify and address the risk of modern slavery in its operations and supply chains.

TT-Line is dedicated to improving its response to modern slavery and this second statement builds upon the information provided in its previous statement for the 2019/2020 financial year. For completeness, where TT-Line's structure, operations and supply chain has remained the same over this reporting period, TT-Line has repeated the same information as in its 2019/2020 statement.

This modern slavery statement has been prepared in consultation with the TT-Line Leadership Team and has been approved by the Board of Directors of TT-Line.

About TT-Line

Company vision

TT-Line's vision is to deliver an unparalleled and unique sea transport service across Bass Strait.

Company mission

TT-Line's mission is to provide a commercially sustainable ferry service built on a reputation for excellence in safety, reliability and exceptional passenger and freight services.

Business objectives

TT-Line manages and facilitates the operation of a shipping service to and from Tasmania in a manner that is consistent with sound commercial practice.

TT-Line endeavours to do this through the provision of passenger and freight services on the Devonport to Melbourne Bass Strait route (and from spring 2022, on the Devonport to Geelong Bass Strait route) and through the operation of the Edgewater Hotel in Devonport.

Approach to modern slavery

TT-Line prides itself on ensuring a safe environment for its passengers, employees and contractors. TT-Line ensures compliance with applicable legislative obligations including, but not limited to, those relating to governance, work health and safety, environment and industrial relations obligations.

To that end, TT-Line is taking a proactive approach to identify, address and prevent modern slavery risks across its operations and supply chains.

Structure, operations and supply chains

Structure

TT-Line is a State-owned corporation formed under the *TT-Line Arrangements Act 1993* (Tas) and is registered in Devonport, Tasmania. TT-Line is a reporting entity under the Act as its annual consolidated revenue exceeded \$100 million in the 2020/2021 reporting period. TT-Line is a financial year reporting entity in accordance with the *Income Tax Assessment Act 1997* (Cth).

TT-Line has two Shareholder Ministers – The Honourable Peter Gutwein MP in his capacity as Treasurer and the Honourable Michael Ferguson MP as Minister for Infrastructure and Transport. The Directors of TT-Line are appointed by the Shareholder Ministers.

TT-Line owns and operates the Spirit of Tasmania I and Spirit of Tasmania II vessels and the Edgewater Hotel in Devonport. TT-Line owns several business names including Spirit of Tasmania, Edgewater Hotel and Edgewater Motor Inn.

TT-Line does not own or control any other entities. Accordingly, TT-Line is the only entity covered by this statement.

TT-Line operates its business in Tasmania and Victoria and has offices in Devonport and Melbourne. TT-Line has approximately 550 employees.

TT-Line's internal organisational structure is made up of:

- Leadership Team;
- Marine Operations Team; and
- Retail and Hospitality Team.

TT-Line's Marine Operations Team reports to the General Manager of Marine Operations and TT-Line's Retail and Hospitality Team reports to the General Manager of Retail and Hospitality.

TT-Line's Company Secretary monitors compliance with TT-Line's Modern Slavery Policy and relevant audit procedures, and their effectiveness on modern slavery prevention, on an annual basis.

Operations

The principal activities of TT-Line are providing commercial passenger, vehicle and freight shipping services between Tasmania and mainland Australia.

The core business of TT-Line is to:

- provide passenger and passenger vehicle ferry services across Bass Strait; and
- provide a freight shipping service across Bass Strait.

TT-Line's main operations as part of this business include:

- food and beverage;
- retail; and
- accommodation (both on board the Spirit of Tasmania vessels and in the Edgewater Hotel).

Supply chains

TT-Line supply chains involve various suppliers and contractors, primarily from within Australia.

TT-Line procures and outsources:

- goods (including, but not limited to, fuel, food and beverages, plant and equipment, lifesaving equipment, accommodation supplies, office supplies, uniforms and tourism souvenirs); and
- services (including, but not limited to, services in relation to security, stevedoring, freight, media, marketing, tourism, sponsorship, IT, maintenance, cleaning, hospitality),

from within and outside Australia.

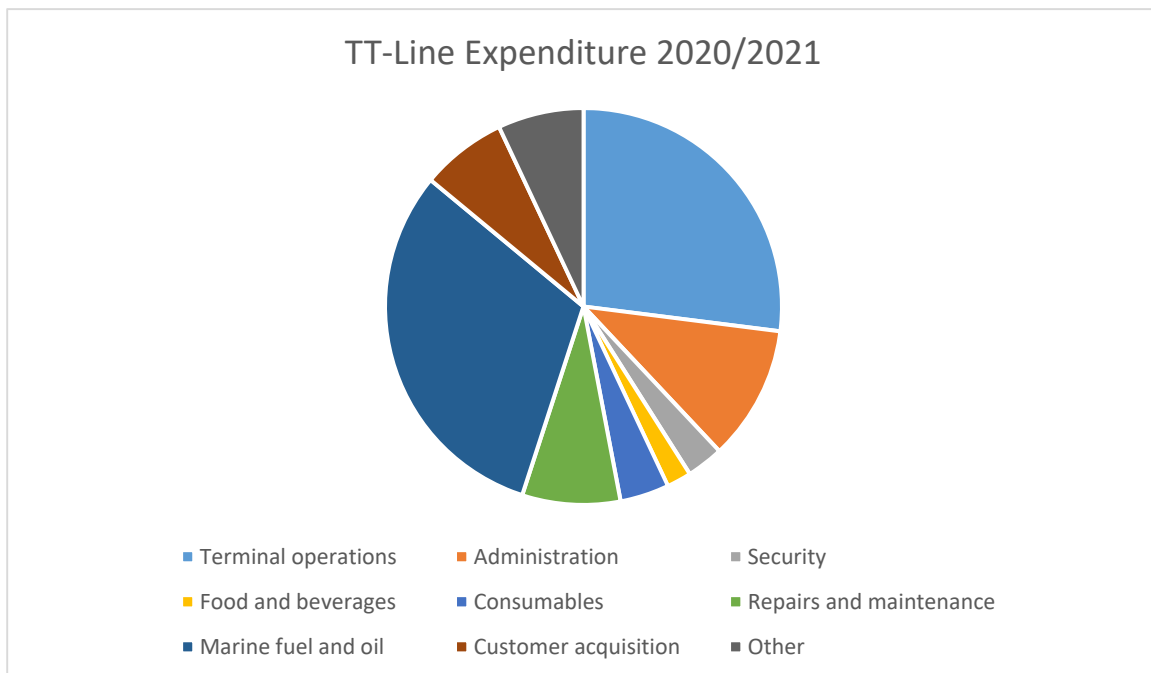
TT-Line enters into agreements and contracts (both short and long term) with suppliers and contractors across a variety of sectors (including accommodation, retail and hospitality, travel, transport, marketing, media, and infrastructure and maintenance).

TT-Line’s suppliers and contractors in turn engage third party suppliers and subcontractors to assist in providing goods and services to TT-Line.

Procurement breakdown in 2020/2021

During 2020/2021, TT-Line’s most significant expenditure was marine fuel and oil, followed by terminal operations, administration, repairs and maintenance, customer acquisition, consumables, security and food and beverages.

An outline of the breakdown of this expenditure is set out below.



Procurement methods

TT-Line’s Procurement Policy establishes internal requirements for the acquisition of goods, services or capital items and, wherever possible, supporting Tasmanian business.

Procurement is undertaken in a way that is consistent with the general principles of value for money, open and effective competition, ethical conduct in purchasing as well as enhancing opportunities for Tasmanian businesses in accordance with the Buy Local Guidelines for Tasmanian Government Businesses. In 2020/2021, 24% of TT-Line’s purchases were from Tasmanian businesses. This is a three per cent increase from the previous reporting period. TT-Line ensures that its operations, management and staff are based within Tasmania to the maximum extent possible, while consistent with the effective operation of the business.

Due to the nature of the maritime industry, not all supplies (including but not limited to fuel and spares for the vessels) are available for purchase in Tasmania.

All of TT-Line’s purchasing is undertaken in a fair and unbiased way in accordance with applicable legislation and TT-Line’s internal policies. This includes:

- TT-Line buyers being fully accountable for the purchasing practices used and the decisions made;
- adhering to TT-Line’s Code of Conduct and Ethics Policy;

- adhering to TT-Line's Modern Slavery Policy;
- identifying, dealing with and documenting issues relating to actual or perceived conflicts of interest; and
- maintaining confidentiality.

Governance and policy framework

In addition to TT-Line's Procurement Policy, TT-Line's corporate governance framework includes policies and procedures that are relevant to modern slavery, including:

- Modern Slavery Policy;
- Public Interest Disclosure Policy;
- Whistleblowing Policy;
- Appropriate Workplace Behaviour Policy;
- Code of Conduct and Ethics Policy;
- Grievance Policy; and
- Privacy Policy.

These documents should be referred to in conjunction with this statement.

All policies listed above apply to TT-Line's employees, contractors, consultants and external service providers and any other person who carries out work in any capacity for TT-Line. These policies outline the standards of personal and corporate conduct that TT-Line expects of all people working with TT-Line.

TT-Line ensures that compliance with these policies is a requirement under all TT-Line employment contracts and part of the induction process as relevant for new employees and contractors. TT-Line also endeavours to make compliance with these TT-Line policies a condition of all supply contracts.

Modern slavery risks in operations and supply chains

Scope of review

During 2020/2021, TT-Line has conducted assessments into the modern slavery risks across relevant industry sectors. As an Australian company with a number of policies and procedures in place to address modern slavery and related issues, TT-Line considers the risk of modern slavery in its direct operations to be low. However, TT-Line acknowledges that it may be exposed to modern slavery risks through its supply chains.

In this reporting period, TT-Line has continued to distribute its modern slavery questionnaires and Modern Slavery Policy to new suppliers to gain further insight into its supply chains. TT-Line has received completed questionnaires from 10 additional suppliers during the 2020/2021 financial year and has analysed these responses to determine any necessary actions to address modern slavery risks.

Since its first Modern Slavery Statement was published, TT-Line has also reviewed the Modern Slavery Statements of each of its key suppliers that have published statements.

While TT-Line's due diligence has not identified any known instances of modern slavery, TT-Line acknowledges that managing modern slavery risks requires ongoing commitment.

When conducting risk assessments into its operations and supply chains, TT-Line referenced tools such as the Global Slavery Index, as well as the due diligence and remediation recommendations in the United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles).

TT-Line's focus in this reporting period has been to conduct further assessment of the nature, context and extent of modern slavery risks in its operations and supply chains. Accordingly, in preparing its modern slavery statement for the 2020/2021 reporting period, TT-Line has not only conducted risk assessments for sectors that are considered higher risk but has demonstrated a continuous improvement approach by also assessing other sectors. This builds upon the company's approach in its 2019/2020 statement, which primarily focused on those sectors considered higher risk.

In this reporting period TT-Line has targeted the following areas for increased due diligence in addition to those assessed during the previous reporting period:

- fuel and oil;
- security; and
- COVID-19 related supplies.

In assessing the risk level of different suppliers and contractors, TT-Line has considered such factors highlighted in guidance from the Australian Government¹ as:

- the type of industry and sector the goods and services are procured from;
- the countries the goods and services from the sector are sourced from;
- the sectors in which there is not clear visibility over sub-contracting arrangements; and
- goods and services that are deemed to be higher risk.

To avoid unnecessary repetition, this statement does not restate the modern slavery risks identified in TT-Line's 2019/2020 statement. Rather, this section summarises risks identified in the previous reporting period and focuses on highlighting the additional due diligence TT-Line conducted during 2020/2021.

Cleaning

TT-Line has taken all reasonable measures to ensure that its cleaning services are not impacted by modern slavery.

TT-Line has conducted further due diligence in this reporting period in relation to its cleaning services. In particular, TT-Line has considered the modern slavery risks from its laundry provider, a Tasmanian based company with Australian based suppliers and subcontractors. The company has its own policies in place and reviews its suppliers' modern slavery policies. TT-Line considers that this provider presents a low risk of modern slavery.

TT-Line vessels are primarily cleaned by employees engaged directly by TT-Line, with additional temporary support provided from employees of a national company for peak and busy periods. This company has detailed and robust policies and procedures in place in relation to modern slavery and there have been no reports of or concerns raised regarding modern slavery in their operations.

Cleaning of TT-Line's terminals in both Melbourne and Devonport is primarily undertaken directly by TT-Line employees, with additional support from a small local cleaning company. This local provider has identified that there is no known modern slavery in their supply chain.

TT-Line continues to engage a sole waste management provider. This provider is a national company and is a reporting entity under the Act. All services supplied to TT-Line are supplied by the provider's own employees. The provider has confirmed that it has not received any reports of or had any concerns raised regarding modern slavery in any of its operations or supply chains. The provider's modern slavery statement identifies its highest risk areas to be its industrial clothing supplier, external subcontractors, and its direct use of temporary labour and agency workers. However, over 99% of this provider's active suppliers operate from Australia or New Zealand. The provider is also advanced in its approach to addressing these modern slavery risks and employs a number of risk mitigation actions such as an anti-slavery strategy, promotion of its whistleblowing program, training, due diligence on key suppliers, purchasing guidelines, a Remediation Procedure, Guidelines for Working with Trafficked People and Modern Slavery Victims, amongst other measures.

Accordingly, TT-Line holds the reasonable belief that modern slavery is not present in its cleaning or waste management operations or supply chains.

Construction and maintenance

TT-Line continues to engage the same construction and maintenance contractors as identified in its previous statement and no instances of modern slavery have been identified in this reporting period.

Since the first TT-Line statement was published, one of TT-Line's primary construction providers has published its own modern slavery statement. The provider identifies that the following are potential risk

¹ Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities.

areas: some protective clothing and equipment, some electronic and computer equipment, some metals-based operations and products, fabrication materials, and some concreting products. The provider conducts comprehensive due diligence on all significant suppliers and subcontractors to actively address these potential risks. Accordingly, the provider considers that its risk of modern slavery is low.

One of TT-Line's primary facilities maintenance suppliers has noted that while it is not a reporting entity under the Act, it has developed a statement to recognise the responsibility for all employee to have an understanding and prevent slavery and human trafficking. The company is Tasmanian owned and operated and uses a very limited supply chain in providing its services to TT-Line and therefore the risk of modern slavery in this supply chain is low.

During the reporting period, TT-Line signed a contract with a ship builder for the construction of two new ships to replace the current Spirit of Tasmania vessels. The shipbuilder is a Finnish company which adheres to international standards and agreements on human rights, employment rights, the environment, and anti-corruption including the Charter of Fundamental Rights of the European Union and the European Convention on Human Rights. Further, despite the shipbuilder being located in Europe, TT-Line has negotiated for up to \$100 million worth of Tasmanian content to be included in the build. To facilitate the procurement of Tasmanian materials and content and to manage the procurement, TT-Line has employed a Tasmanian based Procurement Manager, who will be the representative of the shipyard in Finland in relation to both the procurement of local materials and content, timing, quality and logistics of the delivery of these materials. While TT-Line will not have direct visibility of the company's supply chain, the appointment of the Procurement Manager will assist in assessing and addressing modern slavery risks.

TT-Line is constructing a new passenger and freight terminal at Corio Quay, Geelong. GeelongPort has engaged contractors to build the new terminal during the reporting period. GeelongPort is covered by LINX Cargo Care Group's (**LINX CCG**) modern slavery statement, as one of five entities it owns. The reporting entity notes that all of its employees are based in Australia and New Zealand and that it has assessed there to be a low risk of modern slavery amongst its employee population. To address risks of modern slavery in its extended supply chains, the company has an Anti-Slavery and Human Rights Policy, Code of Conduct and Business Ethics, Procurement Policy and a Vendor Management Framework which must be followed when purchasing goods and services which identifies a framework for avoiding, causing or contributing to adverse human rights impacts. The entity also has advanced remediation procedures in place to address human rights and modern slavery risks.

Food and beverage products

TT-Line continues to engage with the same seafood and food product suppliers as in the previous reporting period.

In particular, TT-Line continues to monitor one of its major international food suppliers to audit its progress in remediating modern slavery issues in its supply chains. Since the previous reporting period the supplier has published its first Australian modern slavery statement and has undertaken a number of human rights improvements including a new Human Rights Due Diligence program and Human Rights Framework and Roadmap. The supplier notes that most of its salient human rights issues occur in supply chains, particularly in agricultural raw materials such as coffee, cocoa, palm oil, sugar. The supplier has also noted the impact of COVID-19 and that there has been a rise in the risk of child labour during lockdowns. While the risk of modern slavery in its supply chain remains high, this is being actively managed by this international supplier. Management by the supplier includes the implementation of an updated grievance case management system to enhance its ability to capture, document and monitor concerns. Increased promotion of the system has led to an increase of cases reported. Going forward, TT-Line is committed to regular engagement with this supplier to ensure it is strengthening its approach to addressing modern slavery challenges.

Another of TT-Line's major food suppliers is a Tasmanian supplier with relevant policies including a Human Rights Statement, Anti Bribery Corruption and Fraud Policy, and Whistleblower Policy. The supplier is a member of Sedex, a membership organisation that provides a platform for companies to manage and improve working conditions in global supply chains. The supplier is externally audited through the Sedex SMETA program. All of the supplier's subcontractors operate in Australia and it has undertaken a supply chain risk assessment for forced/bonded/trafficked labour. The supplier considers that its risk of modern slavery is relatively low but has committed to helping its supply chain to mitigate any risks, particularly where risks are enhanced due to COVID-19.

One of TT-Line's beverage suppliers is a Tasmanian based company which currently does not have any policies and procedures relating to modern slavery, human rights, ethical trading or whistleblowing. While

all the company's suppliers are local, employees can include seasonal workers for fruit picking. Despite the company not being aware of any modern slavery in its operations or supply chains, TT-Line acknowledges that the use of unskilled, temporary or seasonal workers is a potential indicator of modern slavery risk.² TT-Line has open communication with this supplier to assist it to understand and manage its potential modern slavery risk and how it might implement appropriate policies and procedures to address risks.

Souvenirs and tourism items

TT-Line continues to monitor its relationship with its supplier of souvenirs and tourism items. These items are sourced from an Australian company with suppliers throughout China, Hong Kong, India and Taiwan. The company continues to review its relationships with product suppliers and it receives regular audit reports on the ethical standards and conditions for workers and exclusion of slavery and child labour. TT-Line's direct supplier is not aware of any modern slavery occurrences in this supply chain. TT-Line will continue to work with this supplier to assess and prevent the risk of modern slavery in its supply chains.

Fuel and oil

During this reporting period TT-Line conducted assessments of its fuel and oil supply chains.

TT-Line's supplier of fuel to the vessels in Melbourne is a reporting entity and has published its own modern slavery statement since the previous reporting period. The supplier's risk assessment into modern slavery during its reporting period found that the vast majority of its suppliers posed a low modern slavery risk, but notes that one of its highest areas of risk is crude oil and product supply due to the potential for it to be associated with vulnerable populations in higher-risk geographies. The supplier has engaged with its crude oil supplier to conduct due diligence for the on-boarding of new suppliers. The supplier's approach to modern slavery is also set out in its Business Principles and Code of Conduct document and it is committed to publishing its approach to modern slavery performance against key indicators in its Annual Reports. TT-Line will continue to conduct ongoing due diligence in respect of this supplier.

TT-Line also engages a Victorian diesel fuel injection service, repair and parts solution provider. The provider is ISO certified and has control measures to address modern slavery risks and is not aware of any instance of modern slavery in its operations or supply chain. Compliance with modern slavery policies and procedures is monitored by an ISO Manager and senior management is involved in enforcing modern slavery policies and procedures. The provider has a modern slavery policy and a breach of the policy would lead to disciplinary action in accordance with the company's Disciplinary Procedure.

Security

TT-Line's security services provider is not a reporting entity under the Act but has a Human Rights Policy addressing modern slavery. The provider's human rights policy addresses the actions it takes to address human rights issues including both internal and external reporting processes for employees, contractors and/or members of the public to report any circumstances or action that violates or appears to violate its Human Rights policy.

COVID-19 supplies

COVID-19 border closures and travel restrictions in place during the reporting period have impacted TT-Line's operations in many ways, including a decrease in the number of sailings of Spirit of Tasmania vessels and changes to the customer procedures onboard. To continue to provide its services safely, TT-Line purchased a number of COVID-19 products including, but not limited to, hand sanitiser stations and protective screens.

TT-Line acknowledges that such purchases have heightened the modern slavery risks associated with these purchases, as they often needed to be made quickly. Such goods can also often be mass produced at low cost and may be sourced from countries identified as high-risk of modern slavery and produced by workers from vulnerable backgrounds. TT-Line considers the increased risk of these purchases to have been minimal during the reporting period because:

- most materials were sourced from TT-Line's existing suppliers;
- TT-Line's staff are required to comply with procurement/purchasing policies; and
- suppliers were sent modern slavery questionnaires and TT-Line communicated with them about recommended actions to protect their workers during COVID-19.

² Commonwealth Modern Slavery Act 2018 – Guidance for reporting entities, page 80.

Actions to assess and address modern slavery risks

TT-Line has sought to take meaningful steps to identify and respond to modern slavery risks in its operations and supply chains. In its second modern slavery statement the company has focused on addressing commitments made in its 2019/2020 statement and improving upon its approach to modern slavery.

TT-Line primarily addresses the risks of modern slavery practices occurring in its operations and supply chains through strict procurement and operational procedures. To ensure TT-Line is aware of and manages modern slavery risks, TT-Line has:

- issued a due diligence questionnaire to key suppliers and contractors and reviewed and evaluated the responses it has received to date and will continue to undertake this process for any newly engaged suppliers;
- conducted further due diligence on key suppliers and contractors by examining modern slavery statements and policies of those suppliers and contractors;
- ensured that modern slavery is addressed as part of all tender processes;
- built upon the work undertaken in the previous reporting period to conduct risk assessments of higher risk sectors and to also assess sectors not considered to be higher risk;
- worked to ensure that staff are aware of the TT-Line Modern Slavery Policy and the requirement to comply with its terms, with a particular focus on educating the procurement team;
- included its modern slavery clause in supplier contracts. The clause requires suppliers to:
 - comply with all applicable modern slavery laws and TT-Line's Modern Slavery Policy and agree that non-compliance is a basis for contract termination;
 - insert modern slavery clauses into contracts with their suppliers and subcontractors;
 - report to TT-Line as soon as they become aware of any breach, or potential breach, or any actual or suspected modern slavery in a supply chain which has a connection with a TT-Line contract;
 - provide a report to TT-Line each year setting out the steps it has taken to ensure that modern slavery is not taking place in any of its supply chains or any part of its business; and
 - maintain a set of records to trace the supply chain of all goods/services provided to TT-Line in connection with an agreement with TT-Line;
- used its best endeavours to make stakeholders aware of the TT-Line Modern Slavery Policy and the requirement to comply with its terms;
- continued ongoing engagement with contractors and suppliers to better understand potential risks of modern slavery in operations and supply chains; and
- worked with direct suppliers to improve their awareness of modern slavery risks and how they may contribute to modern slavery.

Grievances and Remediation Processes

TT-Line has policies in place to provide employees and contractors with avenues to report any concerns regarding conduct. These include the:

- Grievance Policy;
- Whistleblowing Policy;
- Public Interest Disclosure Policy;
- Code of Conduct and Ethics Policy; and
- Appropriate Workplace Behaviour Policy.

These policies also apply to modern slavery. Specifically, the Modern Slavery Policy provides that TT-Line will assess and investigate any disclosure in relation to modern slavery as it deems appropriate:

- in accordance with its current policies;
- by seeking third party support; and
- by reporting any suspected situations of modern slavery to the Australian Federal Police.

If a breach of the Modern Slavery Policy is identified, TT-Line may take other action as appropriate for the breach such as:

- assisting with remediation where harm or non-compliance is identified;
- issuing formal apologies;
- stopping certain activities or terminating a contract; or
- taking disciplinary action in accordance with its disciplinary procedures.

Measuring the effectiveness of actions

TT-Line acknowledges that it is essential to ensure its actions to assess and address modern slavery risks are effective.

As part of its continuous improvement approach to addressing modern slavery, TT-Line has undertaken the following actions during the reporting period to improve how it monitors the effectiveness of actions to address modern slavery:

- monitored the number of TT-Line's contracts that contain the new modern slavery clause, and the number of suppliers that have completed the modern slavery questionnaire;
- commenced plans to develop key performance indicators (**KPIs**) to better measure the effectiveness of education/training programs, the use of the modern slavery contract clause and the number of questionnaire responses received; and
- commenced plans to develop a more advanced framework to review the effectiveness of actions.

The above-listed actions are in addition to the actions addressed in the 2019/2020 statement, including that TT-Line conducts an annual review of the company's response to modern slavery, and that the Company Secretary, who is responsible for the management of the Modern Slavery Policy, monitors the policy and audit procedures and their effectiveness on an annual basis.

Continuous improvement

In addition to the actions addressed above, TT-Line is committed to continuous improvement in future reporting periods.

Over the next year, TT-Line will progress its work to embed human rights due diligence into its risk and procurement frameworks and to ensure awareness of modern slavery risks throughout the organisation. To achieve this, TT-Line's focus for the next reporting period will be to undertake the following actions:

- expand upon the education of TT-Line staff in relation to modern slavery, including conducting modern slavery training with all staff involved in procurement of goods, services and capital items for TT-Line;
- expand contractor pre-qualification and induction processes to include modern slavery assessments;
- develop a remediation plan going into more detail about how the company will respond to any modern slavery incidents;
- develop KPIs for measuring the effectiveness of actions;
- develop a process/flowchart to identify when the company will seek professional/legal advice relating to modern slavery risks; and

- further strengthen supplier evaluation criteria around modern slavery risk and the embedding of additional modern slavery risk management tools within tender processes.

This Statement was approved by the Board of TT-Line Company Pty Ltd

Signed

A handwritten signature in blue ink, appearing to read "Michael Grainger".

Michael Grainger

Chairman

20 December 2021

Appendix A: Addressing the mandatory reporting criteria

Mandatory criteria	Page number/s
Identify the reporting entity.	2
Describe the reporting entity's structure, operations and supply chains.	3-4
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	5-9
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.	9-10
Describe how the reporting entity assesses the effectiveness of these actions.	10
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).	TT-Line does not own or control any other entities.