



2022

Modern slavery statement

challenger 

A message from the Chair and CEO



Challenger is committed to upholding the highest possible standards of ethics in all aspects of our business.

This involves decisions about who we partner with in our supply chain or where we invest funds we manage on behalf of our clients.

We recognise modern slavery occurs around the world, and in Australia, and could surface in different parts of our own operations and supply chain.

We do not tolerate modern slavery in any aspect of our business operations and have worked to understand the risks we need to address and implement appropriate measures to minimise those risks. Challenger believes in respecting human rights per the United Nations Guiding Principles on Business and Human Rights (UNGPs). Over the reporting period we have implemented numerous measures including:

- engagement with the Property Council of Australia and Informed 365 on the adoption of their Modern Slavery Questionnaire which we issued to high-risk suppliers in our supply chain;
- the roll out of the Cleaning Accountability Framework with outsourced property managers in our Real Estate portfolio; and
- becoming a signatory to the Investors Against Slavery and Trafficking (IAST) and active engagement with our peers to implement change in the financial services sector and improve the quality of modern slavery-related ESG data.

This modern slavery statement represents Challenger's year-on-year commitment to reducing the impacts of modern slavery and playing our role in the preservation of human rights.

This statement has been endorsed by the Board of Directors of Challenger Limited.

A handwritten signature in black ink, appearing to read 'Duncan West'.

Duncan West
Independent Chair

A handwritten signature in black ink, appearing to read 'Nick Hamilton'.

Nick Hamilton
Chief Executive Officer
and Managing Director

About this statement

This modern slavery statement is prepared and issued by Challenger Limited (Challenger), the reporting entity, on behalf of Challenger Life Company Limited (Challenger Life), Fidante and Challenger Investment Management. For the purposes of this statement, these entities will collectively be referred to as Challenger.

This statement is made in accordance with the requirements within the *Modern Slavery Act, 2018* (Cth) (the Act) and covers the period 1 July 2021 to 30 June 2022 representing Challenger's FY22 financial year.

This statement provides detail on Challenger's approach to identifying, mitigating, and addressing the risks of modern slavery across our operations and supply chain.

This Statement uses the Act's definition of Modern Slavery. This involves conduct which would constitute a criminal offence under Australian law or international law, including trafficking in persons and the worst forms of child labour.

In this report, unless otherwise stated, references to 'Challenger', 'the Group', 'we', 'us' and 'our' refer to Challenger, comprising the ASX-listed entity and the Life, Bank, and Funds Management businesses.

About us

OUR PURPOSE

Challenger is an investment management firm focused on providing customers with financial security for a better retirement.

Challenger operates three core investment businesses – a fiduciary Funds Management division, an APRA-regulated Life division and an APRA-regulated authorised deposit-taking institution.

OUR CORPORATE STRATEGY

Challenger has four strategic priorities to ensure that it achieves its purpose of providing customers with financial security for a better retirement.



Broaden customer access across multiple channels



Leverage the combined capabilities of the group



Expand the range of financial products and services for a better retirement



Strengthen resilience and sustainability of Challenger

OUR VALUES

At Challenger, our values are integral to our culture and linked to everything we do. They set out the behaviours we need to deliver on our purpose and strategy and to meet community expectations, now and in the future.



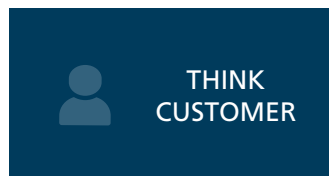
We do things the right way



We deliver outstanding results



We work together to achieve shared goals



We make decisions with our end customers front of mind



Our structure and operations

Challenger is listed on the Australian Securities Exchange (ASX) and has offices in Australia, London, Singapore, and Tokyo. Our activities are subject to supervision by the Australian Prudential Regulation Authority (APRA) and other regulatory agencies both in Australia and in other markets in which Challenger operates. At 30 June 2022, our assets under management were \$99 billion.

CHALLENGER LIFE

The retirement incomes which Challenger Life pays are backed by a high-quality investment portfolio, predominantly invested in fixed income and commercial property investments. These long-term investments generate regular and predictable investment income which is used to fund the retirement incomes paid to Life's customers.

Challenger Life's products are distributed via independent financial advisers, all major advice hubs' Approved Product Lists (APLs) and via financial advisers tied to the leading administration platforms. Challenger Life is also focused on building institutional partnerships with large superannuation funds.

In Japan, Challenger Life has an annuity relationship with Mitsui Sumitomo Primary Life Insurance Company Limited (MS Primary) to provide Australian and US dollar annuities.

FUNDS MANAGEMENT

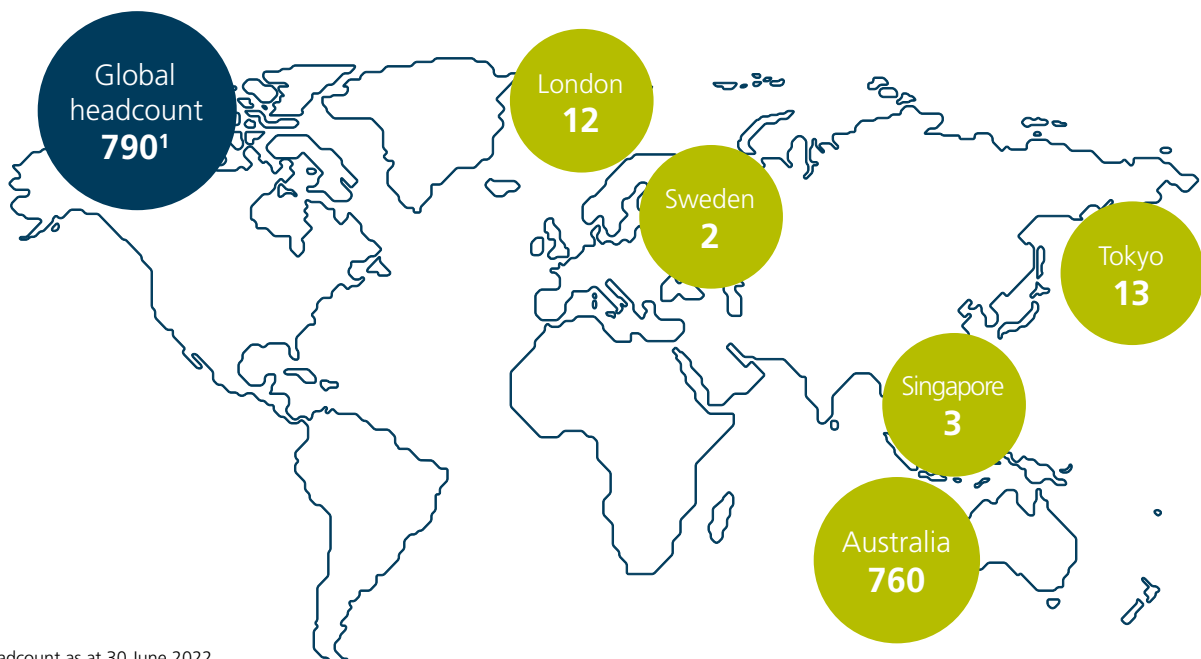
Challenger's Funds Management business comprises Fidante and Challenger Investment Management. The Fidante business model involves taking minority equity interests in separately branded affiliate funds management firms. Challenger provides affiliates with distribution, administration, and business support, which allows investment managers to focus entirely on managing investment portfolios on behalf of their clients.

Challenger Investment Management principally originates and manages fixed income and commercial real estate.

BANK

In 2022, Challenger announced the sale of its digital bank to Heartland Group Holdings Limited. The announcement followed the completion of a strategic review, which found a sale was the best option for Challenger and the Bank's customers and employees, allowing Challenger to focus on its core Life and Funds Management businesses. At the time of publishing, the Bank sale was still subject to regulatory approvals in both Australia and New Zealand.

WHERE WE OPERATE



¹ Global headcount as at 30 June 2022.

Our supply chain

At 30 June 2022, Challenger employed 790 people. This includes permanent employees, casual employees and contractors across Australia, Japan, Singapore, Sweden, and the United Kingdom.

KEY FACTS ABOUT OUR SUPPLY CHAIN

We work with suppliers to procure a range of goods and services. The majority of Challenger's investment operations are conducted by our employees.

Our primary procurement categories are:



Challenger Limited supply chain

- in FY22 Challenger Group made payment to 710 suppliers out of 2,943 suppliers in the database
- 166 suppliers had a spend over \$100,000, and 20% of these suppliers were identified as high risk;
- High risk supply chain sectors include advertising/marketing/promotion, office supplies and equipment, information technology services and repairs and maintenance; and
- Questionnaires were issued to 149 high risk suppliers.

Challenger's Real Estate portfolio supply chain

- Challenger's Real Estate Portfolio directly manages 22 properties including 10 commercial office buildings, 4 industrial and 8 retail assets;
- We engaged with 165 high risk suppliers within our portfolio; and
- 804 suppliers were assessed for modern slavery risks by third party property managers.

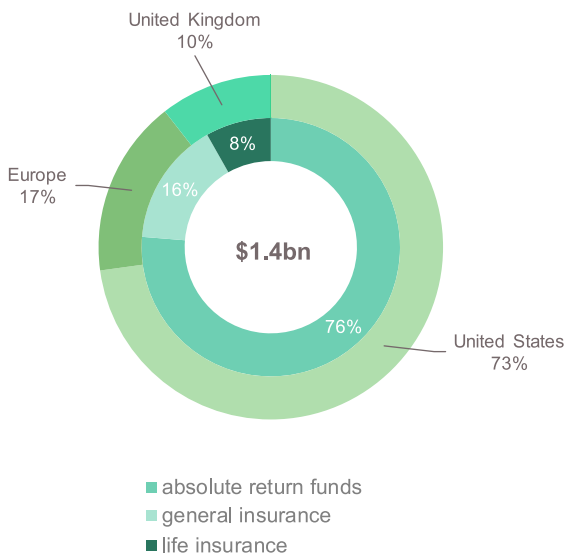
Our investments

Challenger Life Company investments by geography

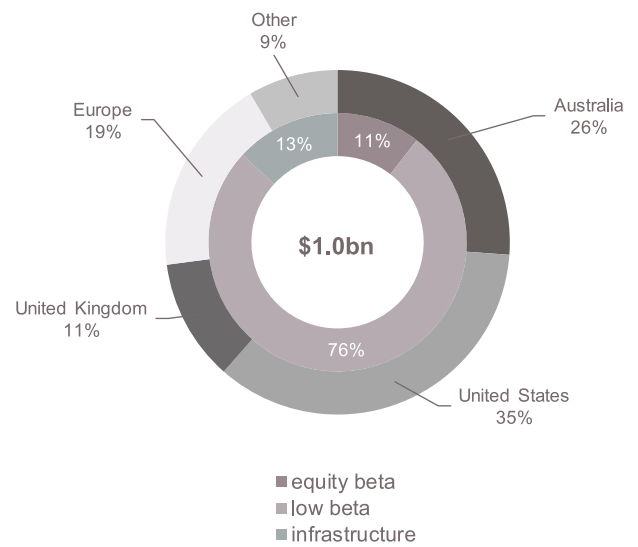
As at 30 June 2022

The below figures relate to Challenger Life Company investments as at 30 June 2022, as reported in Challenger's 2022 Annual Report.

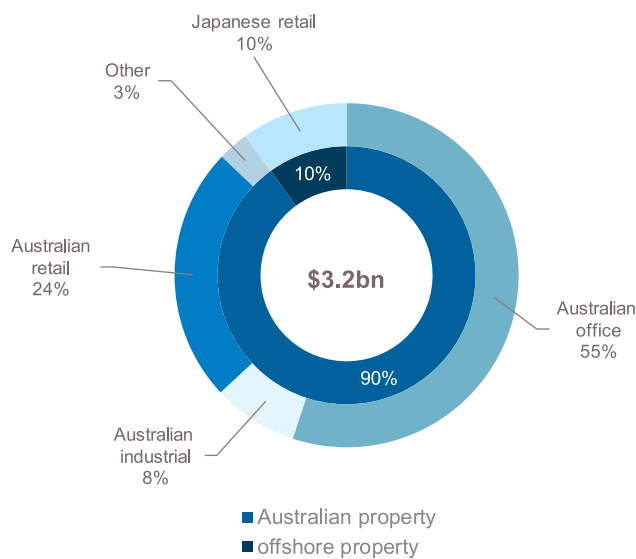
Alternatives portfolio



Equity and infrastructure portfolio



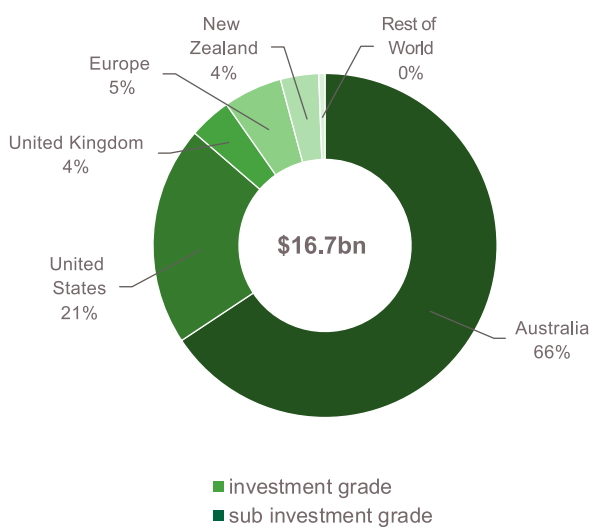
Property portfolio



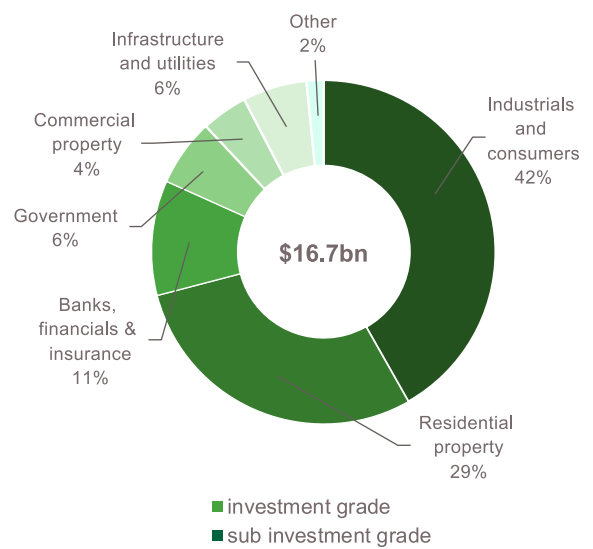
Challenger Life Company fixed income investments by geography and sector

As at 30 June 2022

Fixed income portfolio by geography



Fixed income portfolio by sector



Governance and risk management framework

At Challenger, we have a strong governance and risk management framework that addresses the risk of modern slavery.

We believe good corporate governance enhances stakeholder confidence and adds value to our business. The way we work is informed by our risk culture, which is embedded throughout our operations.

Managing risks and opportunities in our operations and supply chain is a key element of this. We engage with our stakeholders regularly on economic, environmental, social and governance considerations and believe that better outcomes can be achieved by working together.

Our risk-based approach to considering modern slavery risks across our business is informed by the UNGPs.

This approach looks at our commitment to human rights, our systems and controls, remediation considerations and our communication across the activities below.

The high-risk areas identified through our risk assessment, in both our operations and supply chains, have guided our actions over the year.



Assessing modern slavery risk

OUR MODERN SLAVERY RISK AREAS

Our values are integral to our culture and linked to everything we do. One of these values is to act with integrity, and this is about ensuring we're doing things the right way.

We believe risk is everybody's business and this is supported through our 'Making good decisions' framework which is outlined in [Our Code of Conduct](#). Under this framework, our employees are encouraged to ask, "should we?" and not just "can we?".

We understand the significance of modern slavery risks and are committed to addressing the risk to people throughout our operations, and supply chain.

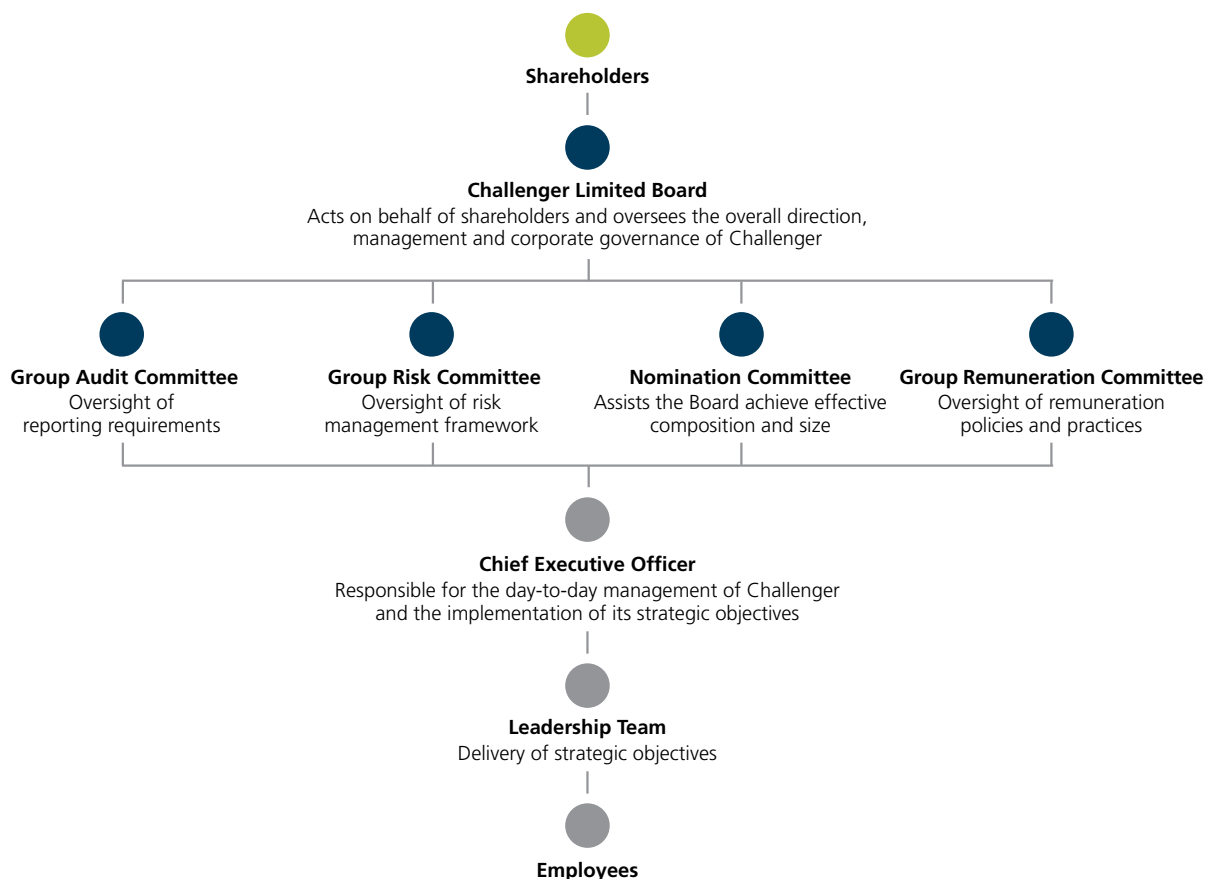
CORPORATE GOVERNANCE

The Group Risk Committee (GRC) assists the Board in setting the appropriate risk appetite in relation to all risks, including modern slavery.

Challenger's ESG Steering Committee monitors key ESG risks and the effectiveness of mitigating activities. This committee is comprised of people from across the business who represent our broad range of stakeholders. This committee reports regularly to the GRC to ensure appropriate oversight.

Challenger is an active signatory to international frameworks committed to driving sustainable practices, including addressing modern slavery, across financial services:

- UN Principles for Responsible Investment;
- Investors Against Slavery and Trafficking Asia Pacific (IAST);
- Responsible Investment Association of Australasia;
- Financial Services Council (FSC) ESG Working Group;
- Informed 365; and
- FTSE4GOOD.



RELATED POLICIES

Challenger has a range of policies in place to help support the identification, management and escalation of potential modern slavery risks across Challenger's operations. These include:

- Anti-money laundering and counter terrorism financing program and policy;
- Code of conduct;
- Complaint and dispute resolution policy and practice note;
- Compliance policy;
- Conduct risk and consequence management framework;
- Fraud and corruption policy;
- Human rights statement;
- Incident management policy;
- Operational risk policy and practice note;
- Outsourcing policy;
- Responsible investment policy;
- Risk appetite statement;
- Risk management strategy; and
- Whistleblower policy.

More information about our approach to [Corporate governance](#) is available on our website.



CONSIDERATION OF RISKS

At Challenger, we take a risk-based approach to addressing modern slavery risks and consider the following when assessing our operations, investment portfolios, and supply chain.



We assess the risks of modern slavery according to the UNGPs on Business and Human Rights, using the three principles of **cause**, **contribute** and **directly linked** in order to assess the risk of involvement of modern slavery in the supply chain and operations. Across our investment teams, the fundamental approach to considering instances of modern slavery in investments is complemented by the use of third party analytics and reporting tools.

Throughout the year we have continued to take action to mitigate high risk areas across our operations, investment portfolios, and supply chain, as identified in our initial risk assessment. Throughout this process we have not identified any specific instances of modern slavery.

HIGH RISK AREAS

Due to the nature of our business, the risk that we cause or contribute to modern slavery practices in our day-to-day operations is low. However, we may be directly linked to modern slavery risk through our supply chain or investments. While we have not identified any instances of modern slavery, we understand the potential for risk in these areas and will continue to monitor them.

Risk category	Description
Real Estate, Property & Facilities Management	Through Challenger Investment Management's property and facilities management service providers, we procure many categories of services for our commercial real estate investments, including cleaning and security. Workers in the facilities management supply chain may be from vulnerable populations, including low skilled or migrant workers, often subject to subcontracting arrangements. If not managed appropriately, this elevates the risk of potential modern slavery practices. In FY22, we identified 165 high risk suppliers.
Overseas supply chains	Challenger sources IT equipment and services from some suppliers in the Asia-Pacific region. This region is estimated to have the most instances of modern slavery globally, so has inherent risks. Materials to develop the equipment and services provided by cloud-based software providers are often sourced from countries with known human rights violations and significant levels of corruption.
Procurement practices	Challenger procures branded and unbranded items used for marketing purposes. These items are produced within an industry that is known to employ business practices that can lead to an increased risk of modern slavery. It is highly price competitive with often short lead times for delivery, creating an increased pressure on suppliers. These items are often mass produced at low cost, in countries with higher risks of modern slavery. Work has also been completed on the tier 2 supply chain. When a supplier and/or product is assessed as high risk, our procurement team look beyond the distributor to where the source of the product is produced. In FY22, 20% of our suppliers were identified as high risk.
Funds Management	We are exposed to higher-risk industries and geographies through investment-related activities and distribution channels of our investment management teams and our affiliate partners. This includes industries such as agriculture and fishing, food and beverage, mining, transport and warehousing, and electronics manufacturing and recycling. These industries are known to operate in geographies that have higher instances of modern slavery, or operate under poor business practices. The assessment also extends to regions in which major companies in developed economies offshore their transaction processing into developing countries. The Funds Management business uses the Global Slavery Index to structure the risk assessment of high risk industries and geographies.

Addressing modern slavery risk in FY22



We took the following actions in FY22 to address modern slavery risk in our operations and supply chain:

POLICY INTEGRATION

We completed a policy gap analysis and updated the following to reflect modern slavery risks:

- Outsourcing policy;
- Challenger Investment Management [responsible investment statement](#);
- Conflicts of interest policy; and
- [Whistleblower policy](#).

SYSTEMS AND CONTROLS

Governance

Challenger's ESG Steering Committee considered ESG risks and opportunities, including the risk associated with modern slavery. The purpose of the Committee is to ensure an integrated ESG approach is taken across the Group, aligned with ongoing risk management and strategy processes.

The Challenger Modern Slavery Working Group, a committee comprised of people from relevant teams across the business, met regularly to discuss progress on action items, modern slavery risks identification, and key initiatives to address and remediate modern slavery risks.

Risk management

In FY22 we worked to embed modern slavery risks into Challenger's enterprise risk management framework. This involved formally documenting all modern slavery risks in a dedicated modern slavery risk register, assigning risk owners, and assessing risk ratings. We also clearly defined the accountability and formal process for assessing modern slavery risk.

These risks have been documented and assessed in accordance with the UNGPs on Business and Human Rights. This has provided clear accountability and a formal process for assessing modern slavery risk, and will be reviewed annually.

Actions taken in FY22

ADDRESSING RISK IN OUR INVESTMENTS

Considering modern slavery factors in Challenger Life's ESG due diligence process

Challenger Life has a robust ESG due diligence process when assessing and onboarding third party investment managers. The due diligence process is managed by the investment management team with guidance from Challenger's Senior ESG Specialist. Modern slavery risk is a key consideration in this process.

Challenger's Senior ESG Specialist reviews the Manager's framework to identify, assess and mitigate modern slavery risks in their portfolios. If the third-party Manager is in a jurisdiction where there may not be a regulatory requirement to consider modern slavery risks, or if the Manager is at an early stage of the development of their ESG processes, Challenger will work with the Manager to develop controls and policies to assess modern slavery risks.

Assessing modern slavery risk in our fixed income portfolio

The Challenger Investment Management Fixed Income team perform modern slavery due diligence and risk assessments for every deal in the portfolio. The team assesses risks around supply chains, industry, geography, employment contracts and labour rights for every investment. Where high risks are flagged, extra due diligence is undertaken.

The team also engage with businesses on areas where there is deemed to be a higher risk of modern slavery based on jurisdiction, industries and type of business structure, such as franchising. An example of this is engagement with a mortgage lending business that has offshore operations. The Challenger Investment Management team engaged the business to ensure appropriate workplace conditions and contracts were in place.

Assessing modern slavery risk in our fixed income portfolio

The Real Estate team within Challenger Investment Management refined processes to identify and address modern slavery risks in their supply chain in FY22.

Key actions include:

- engaging with and utilising the Informed 365 Modern Slavery Questionnaire issued to identified suppliers in higher risk industries. The Real Estate team identify high risk suppliers using the guidance of the Global Slavery Index;
- working with outsourced property management teams to support completion of Modern Slavery Questionnaires; and
- supported the roll out of the Cleaning Accountability Framework (CAF) with our outsourced property manager for the retail portfolio.

The CAF provides transparency in the pricing of a tender with the supplier nominating the labour hours against a property's specifications. The current award rates are then applied into the pricing template which measures whether the cleaning companies are undercutting to 'buy' work in addition to whether the fee sufficiently covers for the appropriate hourly wage rates payable to the employees.

The CAF is now used by Challenger's outsourced property managers tendering for all cleaning services. The outsourced property manager has also incorporated a new cleaning code of conduct to further demonstrate their commitment to fair service provisions in the cleaning industry.

Actions taken in FY22

ADDRESSING RISK IN OUR SUPPLY CHAINS

We refined our data collection process using our internal systems to improve reporting on high-risk industries and geographies. We have also developed modern slavery criteria to be used in consultation with our Outsourcing Policy and have continued to identify areas of improvement for risks identified in last year.

We also developed a framework and triggers to identify residually high-risk suppliers that require further due diligence and potential remediation.

Supplier engagement

We continued discussions with the Property Council of Australia and the Informed 365 initiative, with a view to engaging with our suppliers via the Informed 365 platform.

Challenger sent questionnaires to suppliers via the platform, and responses were received from 141 suppliers. For those suppliers that did not respond, or where the quality of responses was inadequate, we have engaged with both Informed 365 and the suppliers to educate and improve their understanding of modern slavery risks.

Monitoring

We have continued to engage with our Fidante affiliates to understand the risk of modern slavery in their portfolios.

Operational level grievance mechanisms

In FY22, we updated our Whistleblower Policy to include modern slavery practices as an example of Reportable Conduct under the policy. Reports of instances of modern slavery can be made through a number of reporting channels (including anonymously), and eligible persons making the report are provided legal protections.

The Challenger Limited Board of Directors are notified of concerns raised via our reporting channels. In FY22, no instances of modern slavery were reported via this mechanism.

Remediation

While we have not found any instances of modern slavery through our analysis, we will assess remediation actions on a case-by-case basis through our ESG Steering Committee.

Reporting

Information about assessing the risks of modern slavery as part of our Sustainability strategy is provided in our [2022 Sustainability Report](#).

Industry engagement

Challenger is a member of the Financial Services Council's ESG working group. Challenger were active participants in the working group's response to the Modern Slavery issues paper, released in 2022.

Through Challenger Investment Management, we continued discussions with the Property Council of Australia and commenced steps to join the Informed 365 initiative to collaborate with industry peers on a single source of reporting for suppliers in the real estate sector.

Challenger is also a signatory to the Investors Against Slavery and Trafficking (IAST) Asia-Pacific initiative supporting awareness of and bringing attention to this important issue. Challenger is an active participant in workstream 1 and the ESG data subgroup, which is focused on improving the quality of modern slavery data offered by ESG data providers.

Fidante became a member of the Responsible Investment Association of Australasia (RIAA) and an active member of the RIAA's Human Rights Working Group. Through this initiative, we were able to engage on modern slavery issues, including responding to the Government's review of the Commonwealth Modern Slavery Act.

Stakeholder engagement

We continued to engage with our investment teams and other key stakeholders, to ensure investment managers are updated on key ESG matters. This engagement helps our investment teams make informed decisions, and ensures we maintain a consistent approach to modern slavery.

We also responded to a number of requests from external stakeholders for information on our approach to modern slavery.

Education and awareness

As part of Challenger's commitment to embed sustainability and improve understanding across the business, Challenger held a two-day internal Sustainability Summit attended by Challenger's Non-Executive Directors, the Leadership Team, and senior executives. The summit included workshops and presentations from peers, investors, and industry experts, with the outputs informing Challenger's future sustainability focus, including modern slavery.

Our modern slavery working group is comprised of representatives from across the business who work together to assess, mitigate, and monitor risks of modern slavery. Members of the modern slavery working group attended industry events and webinars to enhance understanding of key modern slavery risks. Information gathered at these events was shared through team presentations.

Supporting this, we investigated training options for key teams to help them understand modern slavery risks and how to identify them. This involves researching the types of training options available, determining which option is fit for purpose for the size, nature, and complexity of the modern slavery risks of our organisation, with training to be completed by key teams in FY23.

Effectiveness of our actions

Our approach to measuring the effectiveness of actions taken toward mitigating the risk of modern slavery continues to evolve. Our activities are governed by Challenger's ESG Steering Committee.

This committee monitors the status and quality of measures put in place to mitigate identified risks. It provides guidance and advice and makes decisions about required actions to address newly-identified risks. It also monitors progress on implementation reports to the Group Risk Committee each quarter to ensure appropriate oversight.

The table below summarises what and how Challenger measures the effectiveness of its actions, and our specific results for FY22. As we continue to mature our methodology of identifying and mitigating the risk of modern slavery, how we measure the effectiveness of our actions will evolve.

What we aim to measure	How we measure	Results in FY22
Oversight of our modern slavery risks	Integration of modern slavery with existing frameworks and policies	<ul style="list-style-type: none"> Formal modern slavery risk register developed in line with UNGPs Updated four policies to explicitly include modern slavery
	Internal oversight forums and working groups	<ul style="list-style-type: none"> ESG committee reports to the Governance Risk and Compliance (GRC) Committee Modern slavery working group
	Engagement with industry and better practice	<ul style="list-style-type: none"> Industry group engagement including IAST, RIAA and FSC ESG Working Group Real Estate working group participation with engagement with Informed 365 and Property Council of Australia
Identification of modern slavery risks	Modern slavery risks assessed across Challenger	<ul style="list-style-type: none"> Modern slavery risks were assessed in our supply chain as part of compliance with our Outsourcing Policy for any new outsourced providers Modern slavery risks were also assessed within our investment portfolios Ongoing monitoring and escalation of incidents, complaints and whistleblower reports for any potential instances of modern slavery
	Continuous improvement of modern slavery risk assessment tools	<ul style="list-style-type: none"> A framework outlining high-risk triggers in the due diligence questionnaire was developed, forming the foundation for further due diligence, remediation and action planning Research into modern slavery risk management practices at other financial services organisations
Actions to address modern slavery risks	Supplier due diligence and engagement	<ul style="list-style-type: none"> Due diligence questionnaires sent out to 165 inherently high-risk suppliers in our Real Estate portfolio. These suppliers were identified based on their industry and geography, and will provide further insight into their modern slavery risk management practices
	Improved training and awareness	<ul style="list-style-type: none"> Challenger's Sustainability Summit was attended by Challenger Board members, Leadership Team and senior executives to help improve understanding of ESG across our business. Investigation of training options for key teams

Actions planned for FY23

Modern slavery is a global issue embedded throughout our economy. We recognise it will take time to change and we're committed to evolving our approach to ensure we're playing our part. We have a number of actions planned for FY23, some of which are already underway.

COMMITMENT TO HUMAN RIGHTS

- Continue to participate in industry initiatives aimed at eradicating modern slavery;
- Continue to share our approach to addressing modern slavery risks with stakeholders via a detailed engagement program; and
- Engage with the Property Manager of Challenger's head office at 5 Martin Place, Sydney, to ensure compliance with the standard of the Cleaning Accountability Framework.

SYSTEMS AND CONTROLS

- Continue to review and reassess risks of modern slavery across our operations, investment portfolios and supply chain to monitor known risks and identify additional risk areas;
- Continue to enhance modern slavery risk assessment tools, including adopting the ISS modern slavery scorecard;
- Embed formal modern slavery clauses in supplier contracts;
- Develop an Operational Guidance Note which contains criteria on the minimum standards of acceptable responses to supplier and investment questionnaires, including a minimum standard for inherent and residual risk;
- Educate employees on modern slavery risks through the implementation of a Modern Slavery Training Module; and
- Provide education opportunities to our Fidante affiliates through tailored modern slavery compliance training.

REMEDICATION AND COMMUNICATION

- Continue to develop our approach to remediation through our ESG Steering Committee; and
- Leverage the Informed 365 platform as an open communication channel with our real estate suppliers.

We will continue to build on and enhance our approach to managing modern slavery risks right across our business.

ACTIONS BEYOND FY23

- Apply data analytics techniques to identify residually high-risk suppliers and develop tailored actions with any identified higher risk suppliers;
- Enhance reporting to better understand annual spend with key suppliers and to facilitate risk assessments. This will support further engagement with high-risk suppliers to ensure key controls are implemented across our supply chain;
- Continue to integrate suppliers onto the Informed 365 platform to address modern slavery risks in our procurement activities and our real estate portfolio;
- Improve the way we engage with suppliers in our real estate portfolio that we deem to have a high inherent risk to encourage policy development, training and risk assessments;
- Leverage the Informed 365 platform to send questionnaires to selected suppliers;
- Work towards a Group Supplier Management Framework that incorporates modern slavery risks and controls, including the development of minimum standards that will be incorporated into Challenger's Supplier Code of Conduct;
- Develop a structured remediation process if instances of modern slavery are identified; and
- Engage with and provide training to Challenger's outsourced property management teams.

Our consultation process

HOW WE COLLABORATE

We regularly communicate with entities we own and control. They have been involved in the development of risk assessment processes, mitigating activities, and generating ideas for continuous improvement. They have also been included in programs developed to educate employees on modern slavery risks. Feedback from our entities has informed the development of this Statement.

The Challenger Modern Slavery Working Group is a cross functional working group focused on enhancing Challenger's modern slavery framework to assess modern slavery risks and remediate any instances of modern slavery identified.

The Working Group has been involved in the development of this statement, including participation in a workshop led by a human rights adviser to gather information about key activities completed in FY22 and plans for FY23.



APPENDIX A

MEETING THE LEGISLATION

Criterion	Section
Criterion 1 identify the entity that is reporting	About this statement (p2)
Criterion 2 describe the structure, operations, and supply chains of the reporting entity	About us (p3-8)
Criterion 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	Our modern slavery risk areas (p9-12)
Criterion 4 describe the actions taken by the reporting entity (and owned or controlled entities) to assess and address those risks, including due diligence and remediation processes	Our actions (p13-16)
Criterion 5 describe how the reporting entity assesses the effectiveness of these actions	Effectiveness of our actions (p15)
Criterion 6 describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	How we collaborate (p17)