Brookfield

BPIH Pty Ltd and Arc Infrastructure Pty Ltd

Modern Slavery Statement 2023

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Background

This Modern Slavery Statement (**Statement**) is made by BPIH Pty Ltd (**BPIH**) on behalf of itself and its subsidiary, Arc Infrastructure Pty Ltd (**Arc**), together the Reporting Entities, in accordance with the *Modern Slavery Act* 2018 (Cth) (**Act**), for the financial year ended 31 December 2023 (**Reporting Period**). The Reporting Entities remain opposed to human trafficking and slavery both within their businesses and supply chains and fully support the objectives of the Act.

The Reporting Entities are part of the global Brookfield Corporation and Brookfield Asset Management Ltd. (**Brookfield**) group, which in Australia consists of diverse real estate, infrastructure, and private equity portfolios across key cities. Globally, Brookfield is a leading global alternative asset manager, focused on investing in long-life, high-quality assets across real estate, infrastructure, renewable power and transition, credit, and private equity. The Reporting Entities and their related entities represent a diverse portfolio of critical infrastructure assets, including transport, utilities, data and midstream. Brookfield Corporation is a signatory to the United Nations-supported Principles for Responsible Investment, which is part of our ongoing commitment to responsible investment and sustainability. Brookfield seeks to employ best-in-class responsible investment, sustainability and corporate social responsibility practices, mindful of the important role this plays in fostering long-term value creation. In Australia, the Reporting Entities follow the same principles in day-to-day business activities.

In this Statement, references to "we", "us" or "our" refer to the Reporting Entities. The Reporting Entities and controlled assets largely operate the same processes, supply chain management practices and operating systems.

Structure, operations and supply chains

REPORTING ENTITY	STRUCTURE & OPERATIONS	SUPPLY CHAIN
BPIH Pty Ltd ACN: 100 364 234 Brookfield Place Level 19, 10 Carrington St, Sydney NSW 2000	 BPIH's ultimate parent is Brookfield Corporation. BPIH does not employ any employees. BPIH is the head entity of a consolidated group which engages in the following activities: corporate services, including administration, finance, treasury, tax, internal audit, information technology, company secretarial, compliance, sourcing/procurement investment in infrastructure assets BPIH held a non-controlling interest in Natural Gas Pipeline Company of America LLC (NGPL) until December 2023. This foreign asset was managed by an American entity and operated independently of BPIH. The entity is not a reporting entity for the purposes of the Act. 	 BPIH's suppliers are primarily Australia based companies although some of the goods and services that they supply may originate from outside Australia. Suppliers domiciled outside Australia are predominantly located in North America (USA and Canada) and Europe and are engaged to deliver professional services. Spend is distributed across approximately 30 vendors and several categories. The main types of goods and services procured by BPIH are: Professional services including auditing, accounting, tax, legal, recruitment and advisory services primarily from top tier organisations that are typically reporting entities pursuant to the Act Shared services provided by Brookfield related entities including outsourced finance and internal audit services
Arc Infrastructure Pty Ltd ACN: 094 721 301 Level 3, 1 George Wiencke Drive Perth Airport WA 6105	 Arc is a railway infrastructure manager and access provider in Western Australia with a long-term lease on the rail freight network from the State of Western Australia. Arc operates and maintains approximately 5,500 kilometres of standard, narrow and dual gauge rail infrastructure across the State. Arc employs approximately 573 staff where: 92.8% are employed on a full-time basis, 4.9% on part-time and 2.3% on casual 85.5% are permanent workers, 12.2% are contract workers and 2.3% are casual workers 20.4% are female workers and 79.6% are male workers Arc has a number of offices spread across the Perth metropolitan area and the regional areas within the southern half of Western Australia. Its head office is based at Perth Airport. Staff are employed across the various offices in the following functions: 	 The majority of Arc's tier one suppliers are Australia-based companies, although some of the goods and services that they supply originate from other countries. Arc's annual spend is distributed across approximately 1,000 suppliers and several categories, including: railway infrastructure materials, equipment and services engineering and project management services building construction, repair and maintenance services software, IT and telecommunications services and hardware electronics travel and accommodation services work wear and personal protective equipment (PPE) building cleaning and security human resources services logistics Arc's largest categories of supplier spend

REPORTING ENTITY

STRUCTURE & OPERATIONS

SUPPLY CHAIN

- Administration (finance, human resources, risk and compliance, communications, information technology, procurement, commercial and regulatory, business support and facilities management)
- Health, safety and environment
- Track maintenance
- Track signalling and communications
- Engineering
- Projects
- Network operations
- Asset Strategy and Planning
- Contract workers and casual workers perform a wide range of roles across all functions, from IT and network operations, through to business support officers and project engineers.
- Arc is part of the Arc Infrastructure WA Pty Ltd group which includes 10 entities with Arc being the operating entity who engages with all of Arc's suppliers.

relate to rail infrastructure costs, including rail, electrical components, labour, rail maintenance and civil construction services.

Modern slavery risks in operations and supply chains

In the Reporting Period, the Reporting Entities did not identify any instances of modern slavery in our operations or supply chain. We acknowledge that this does not necessarily mean that modern slavery was not present in our supply chain, and that we continue to seek improvement in our ability to identify modern slavery risks in our operations and supply chain.

MODERN SLAVERY RISKS IN OUR DIRECT WORKFORCE

Given the fact that our operations have remained largely unchanged from 2022, we remain of the view that the risks of modern slavery practices within our direct operations and workforce is low. Employees of the Reporting Entities are based in Australia (primarily Western Australia), which is ranked 149 out of 160 countries for modern slavery prevalence by the 2023 Global Slavery Index (**GSI**). Despite the low prevalence of modern slavery in Australia, the GSI has brought to light that on any given day in 2021, there were 41,000 individuals living in modern slavery in Australia. This estimate reminds us that despite Australia's strong rule of law and efforts by the government, business community and individuals as consumers to mitigate the risks, modern slavery occurs in Australia.

We remain conscious of the GSI finding in the way in which we conduct our recruitment of our workforce and implement workplace policies and procedures. For example, as noted in our previous statements, human resource policies, procedures and processes are in place and designed to ensure that staff are remunerated in accordance with applicable laws and awards and/or agreements and are working of their own free will, including their rights under the employment agreements. All workers are free to join unions or associations relating to their employment.

We continue to maintain and monitor processes for reporting and resolution of staff concerns and grievances. Having regard to the aforementioned safeguards that continue to remain in place in our operations together with the low jurisdiction risk, our view is that there is a low risk that we have caused or contributed to modern slavery in our operations.

MODERN SLAVERY RISKS IN OUR SUPPLY CHAINS

During the Reporting Period, we continued to review the potential risk of modern slavery within our supply chain. We remain committed to conducting our business in an ethical and responsible manner, including by carrying out our own procurement activities in a way that considers the modern slavery risks, including child and forced labor, in the supply chains of the goods and services that we procure. This is reflected in our contract terms with suppliers, due diligence processes, training and communications, as appropriate.

In accordance with the United Nations Guiding Principles on Business and Human Rights (**UNGPs**), we continue to take a risk-based approach to identifying the greatest areas of modern slavery risk within our supply chain. This approach enables us to prioritise our actions commensurate with risk.

Much like our operations that have remained unchanged from 2022, our supply chain also remains largely unchanged. Accordingly, the description of modern slavery risks in our 2022 statement is largely consistent with the risks pertaining to our supply chain in 2023. The list below of categories within our supply chain with increased risks was based on indicators including inherent industry risks, raw materials risks within the components in finished goods supplied to us, and workforce profile – that is where a products' supply chain is reliant upon low-skilled workers, often on temporary visas:

Cleaning and janitorial services	
Electronics and IT hardware and devices	
Catering and hospitality services	
Security services	
Building, construction, maintenance and repair services, and materials including solar pa	anels

Rollingstock

Logistics

Office supplies (tea/coffee, stationery and other consumables)
Uniform and corporate merchandise
Manufacturing
Machinery and equipment wholesaling

We recognise that each of our suppliers have their own supply chain risks and our category-based assessment sought to factor in these risks to the extent possible. A small number of our suppliers are in jurisdictions that are more vulnerable to modern slavery including China, India, Taiwan and Indonesia.¹

¹ As drawn from the interim Modern Slavery Questionnaire results.

Our approach to mitigating modern slavery risks in our operations and supply chains

The Reporting Entities remain committed to seeking improvement in their efforts to mitigate the risks of modern slavery in their operations and supply chain. In doing so, the Reporting Entities recognise the importance of embedding human rights considerations, including modern slavery, in the way we conduct our business activities, through training, communications, contracts, and due diligence processes, as appropriate. These practices extend to our interactions with our key vendors and other business partners.

POLICY FRAMEWORK

During the Reporting Period, we reviewed and updated a number of our policies to ensure we continue to have a comprehensive framework of policies which mitigate modern slavery risks and implemented our updated framework of policies set out below. These policies describe the principles and requirements for our employees and for our vendors to follow and include:

• Global Human Rights and Anti-Modern Slavery Policy

During the Reporting Period, we expanded our modern slavery program by replacing our existing modern slavery policy with a global Human Rights and Modern Slavery Policy, thereby codifying our approach to respecting fundamental human rights and our efforts to identify and prevent human rights violations within our business and supply chain. This policy applies to employees of the Reporting Entities. This policy outlines the related policies and procedures and approach for communication, training, remediation and governance.

Importantly, the Policy makes clear that where Brookfield identifies that it has caused or contributed to human rights violations, it will, wherever practicable and reasonable, take appropriate action to mitigate or remedy the violation, taking into account all relevant circumstances (including, but not limited to (i) the extent to which Brookfield has directly caused or contributed to the violation, (ii) Brookfield's ability to influence the mitigation or remedy of the violation, and (iii) any wider consequences which may flow from Brookfield's action).

• Code of Business Conduct and Ethics (Code)

This Code outlines our commitment to, and expectations of, conducting business in an ethical and responsible manner and prohibiting child and other forced labour. It applies to all officers, employees and temporary workers, with annual certification of compliance.²

• Procurement and Payment Policy and Control Principles

These documents describe the process for sourcing, exercising due diligence and monitoring new and existing vendors with the intention of managing risks including modern slavery. It applies to all employees of the Reporting Entities who have a procurement function.

• Vendor Risk Management Framework

This document describes the framework when purchasing goods or services for, or on behalf of, the Reporting Entities and defines the processes to assess, monitor and mitigate vendor risk. This includes modern slavery risks.

• Sustainability Report³

Following the launch of Arc's Sustainability Strategy in March 2022, Arc published its first Sustainability Report in May 2023. Arc's Sustainability Strategy describes Arc's analysis of the 17 UN Sustainable Development Goals and the supporting 169 targets, with a view to identifying how we could best contribute to these goals. It sets out our plan to embed and enhance sustainable practices across our business. Arc's Sustainability Report shares the progress of the key initiatives identified in the Sustainability Strategy, including updates on the performance of the themes within the Sustainability Strategy. Monitoring, assessing and preventing modern slavery is one aspect of Arc's Sustainability Strategy and is captured within the Safety and Risk Management theme.

On 28 November 2022, Arc's Supplier Code of Conduct (Supplier Code) was published on its website together with a

² <u>https://bam.brookfield.com/sites/brookfield-bam/files/BAM-IR-Master/Corporate-Governance/2024/BAM%20-</u> %20Code%20of%20Business%20Conduct%20and%20Ethics%20May%202024%20English.pdf

³ <u>https://www.arcinfra.com/ARCInfrastructure/media/documents/Newsroom/2023-Arc-Sustainability-Report.pdf</u>

newsroom update⁴. This Supplier Code outlines Arc's expectations and minimum standards for its suppliers with respect to legal, ethical, environmental and social matters. It requires suppliers to comply with applicable modern slavery laws, manage modern slavery risks within their own supply chains, and also ensure that their own suppliers are similarly taking active steps to address and minimise the risks of modern slavery within their supply chains. Specific standards are detailed in relation to matters such as working conditions, wages, working hours, subcontracting and how to report concerns via Arc's complaints or whistleblowing mechanisms.

The Supplier Code reserves Arc's right to request information from suppliers and to undertake due diligence and risk assessments to verify supplier compliance. Arc's procurement contract templates were previously updated to include a requirement for Arc's suppliers to comply with the Supplier Code, and all new procurement contracts issued by Arc include a reference to the Supplier Code. During the Reporting Period, Arc continued with the inclusion of provisions requiring compliance with the Supplier Code in all extensions and variations of existing contracts.

PROCUREMENT

We continued to implement mitigation strategies for high-risk vendors on a case by case basis - such as specific contract clauses in agreements, requesting the vendor to provide their modern slavery statement and evidence of their modern slavery mitigation strategies. The strategies may also include audits of their internal processes and policies and establishing grounds for spot audits.

The Reporting Entities updated their procurement contract templates and vendor purchase order terms and conditions, where applicable, shortly prior to the Reporting Period to incorporate provisions prohibiting modern slavery practices by the vendor and requiring them to do all things necessary to mitigate or reduce risks of modern slavery within the vendor's operations or supply chain. During the Reporting Period, all new procurement contracts entered into contained these modern slavery provisions and existing procurement contracts which were due for renewal were updated to include modern slavery provisions wherever possible.

Those of our vendors considered to be potentially high risk of impacting human rights continue to be subject to ongoing monitoring via a third party online platform.

TRAINING AND EDUCATION

We continued to deliver mandatory training to our employees in relation to human rights and modern slavery. The training was provided via an eLearning module and covered the definition of modern slavery, why modern slavery is an important issue for the Reporting Entities and our employees, and the relevance to our operations and supply chains including example scenarios. It also advised employees on how to report a known or suspected modern slavery risk.

Arc's Procurement Contracts and Sourcing Lead joined the Modern Slavery Network set up by the <u>Australian Railway</u> <u>Association</u> (**ARA**) during the Reporting Period. The ARA Modern Slavery Network has been set up by the ARA for member organisations to discuss measures industry is taking to prevent modern slavery in the rail supply chain. Within our next Reporting Period, the network will meet again to continue to provide opportunities for information sharing and collaboration, bringing other practices and knowledge from industry partners into Arc's modern slavery mitigation strategies.

MODERN SLAVERY RISK MANAGEMENT AND DUE DILIGENCE

During the Reporting Period, we continued to deploy our due diligence processes that form part of our Vendor Risk Management Framework, which seeks to assess and respond to human rights and modern slavery risks.

Vendors are generally given a preliminary risk rating against an established criterion which determines their ongoing performance management and due diligence. Additional assessment and vendor engagement is conducted on vendors that are determined to be potentially high risk for modern slavery. Such vendors may be required to complete a modern slavery screening questionnaire to qualify and to provide services to the Reporting Entities, which is reviewed by a member of the procurement and risk teams as part of the vendor risk assessment and vendor approval process. Where an actual or suspected instance of modern slavery is identified within the supply chains or operations of a vendor, the procurement and risk teams will work with the impacted business unit to decide on the most appropriate remedy taking guidance from the UNGPs.

Arc continues to vet and monitor its vendors via a third party online platform to identify whether a vendor is potentially involved in any human rights or similar violations based on material available online. During the Reporting Period, this platform was further updated to help Arc record its assessed modern slavery risk rating for each vendor

⁴ <u>https://www.arcinfra.com/ARCInfrastructure/media/documents/Supplier%20info/W702-000-002-Supplier-Code-of-Conduct-Rev-1-00.pdf</u>; <u>https://www.arcinfra.com/Newsroom/Arc-s-first-Supplier-Code-of-Conduct</u>

to assist with data reporting.

During the previous Reporting Period, Arc conducted enhanced due diligence on the manufacturer of solar panels being installed across the network, with the findings and identified risks presented to the Audit & Risk Committee. Solar panels were selected on the basis of the saliency of the human rights risks in the manufacture of the panels where allegations of widespread state-sanctioned forced labour were widely publicised in the media and examined by civil society groups and academia. As part of this process, the vendors' systems and policies and procedures relating to modern slavery, human trafficking and related workers' rights issues were reviewed. Ongoing monitoring of this manufacturer, and all other high-risk suppliers, was undertaken via the third party online platform during the Reporting Period.

In order to assess potential modern slavery risks within our supply chains and have a reasonable basis for the opinions expressed in this Statement, Arc engaged the services of ethixbase360 to deploy a third party due diligence platform. The modern slavery questionnaire on the ethixbase360 platform was developed by legal firm Norton Rose Fulbright to provide an indicative modern slavery risk rating of suppliers based on the responses to a questionnaire.

During the Reporting Period, Arc continued to issue the Modern Slavery Questionnaire to a targeted supplier list via the ethixbase360 platform.

The Modern Slavery Questionnaire uses five key indicators to assess a supplier's modern slavery risk profile, namely:

- Jurisdiction (country) of operations and headquarters;
- Industry of supplier / industry of goods & services supplied;
- Products attributed to high risk of modern slavery;
- Workforce characteristics; and
- Risk-mitigating measures specific to the individual supplier.

In the previous Reporting Period, Arc identified suppliers in its supply chain to target for the purposes of the questionnaire, focusing on vendors with significant annual spend and greater inherent risk based on industry, product type and geographical location. Below is a summary of the information obtained from the Modern Slavery Questionnaire undertaken during the Reporting Period:

• The Modern Slavery Questionnaire was issued to 172 suppliers and 57 suppliers submitted their completed responses within the set timeframe. Based on the completed responses, the distribution of modern slavery risk ratings are shown in the following chart:



- The majority of suppliers that responded to the questionnaire operate in industries with higher inherent risks. However, most of those suppliers indicated that they source, operate or manufacture in lower risk countries such as Australia, Spain, UK, Germany, Belgium, Japan, United States and South Korea, with only a handful stating that they source from higher risk countries such as China, India and Indonesia.
- No suppliers indicated that:
 - \circ workers must pay a recruitment fee to secure work on their sites; or
 - workers must surrender their passports or other forms of original personal identification to anyone prior to commencing work.
- Suppliers that will require further due diligence include those that responded in the following way:
 - The suppliers that do not have in place adequate policies, controls, procedures and training designed to prevent, detect, assess, manage and remedy modern slavery within their operations and supply chains;
 - o The suppliers that source higher risk raw materials without a responsible sourcing policy; and
 - The suppliers that employ potentially vulnerable categories of workers, including base-skilled workers,

migrant workers, labour hire workers and young workers under 18, and the supplier operates in a higher risk industry.

Arc will continue to work with the suppliers that require further due diligence to mitigate the risks of modern slavery in our supply chain. Arc will also look to enhance the participation and engagement with suppliers on completing the Modern Slavery Questionnaire in the next reporting period. Commencing in June 2024, Arc will be issuing the Modern Slavery Questionnaire to new suppliers that are classified as medium or high risk of modern slavery during the supplier onboarding process. The mandatory completion of the questionnaire during the supplier onboarding process will encourage a more proactive dialogue with our suppliers about the risk of modern slavery within their supply chain.

GRIEVANCES AND REMEDIATION

The Reporting Entities maintain and monitor an anonymous Reporting Hotline for its employees, vendors and other stakeholders to report any matters relating to unethical business conduct or violations of Laws, with the option to do so anonymously. Modern slavery is reportable on this hotline. During the Reporting Period, we did not receive complaints related to modern slavery via our Reporting Hotline or the whistleblower system.

The Reporting Hotline forms part of our Code of Business Conduct and Ethics and Supplier Code, which has been designed to provide protection to disclosers, ensure reports are dealt with appropriately, and protect disclosers from victimisation and retaliation. It is available toll-free, 24 hours a day, 7 days a week and may be accessed by phone or by Internet. It is managed by an independent third party and allows anyone to call anonymously to report in English and other languages. Details of Brookfield's Reporting Hotline is included in its Code of Business Conduct and Ethics. The details of Arc's Reporting Hotline are shown below:

Reporting Concerns

Arc values and encourages its suppliers, employees, communities and any other stakeholders to speak up if they have concerns regarding a possible violation of this Code or our own Code of Business Conduct and Ethics.

Suspected or actual breaches may be reported to Arc's Confidential Whistleblower Platform "Whispli" via: • Telephone: +61 8 7828 5999; or

Website: arcinfra.whispli.com/pages/speakup

The Whistleblower Hotline is an independent and confidential reporting line that operates 24 hours a day, 7 days a week and allows anyone to report anonymously. All complaints and reports are treated seriously and Arc will conduct, where appropriate, a confidential and objective investigation into the complaint or report.

Remediation is approached on a case-by-case basis with the aim of protecting the victim from further harm. We would take guidance from the UNGPs in planning our response to remedy where we have caused or contributed to modern slavery. In the event that we become directly linked to modern slavery via the conduct of our suppliers, depending on the circumstances, we would seek to work with the supplier to identify the root cause and develop a collaborative corrective plan to mitigate similar risks arising again. In line with the UNGPs, we consider termination a measure of last resort given the further potential adverse impacts for workers and their families where termination is triggered.

Assessing the effectiveness of actions taken

We seek to assess the effectiveness of our actions by reference to the following overarching measures:

- Regular engagement and feedback on the subject matter provided between core departments such as Portfolio Management, Risk Management, Finance, Legal and Human Resources
- Monitoring and reporting on modern slavery risks to management directors and Board reporting framework
- Data on the key risks, including of modern slavery, are collected by the Procurement Contract Team and is provided to the Governance and Risk Team who then report quarterly to Arc's Audit, Risk and Compliance Committee
- Monitoring and tracking all reports to the Ethics Hotline

We also continue to review and report against a number of indicators. These include:

Incidences of modern slavery in our operations	In the Reporting Period, we had no reported incidents of modern slavery in our operations.
Incidences of modern slavery in our supply chain	In the Reporting Period, we had no reported incidents of modern slavery in our supply chains.
	Note: Whilst evaluating vendor submissions for a Request for Proposal Arc identified allegations of modern slavery relating to the supply chain of one of the prospective vendors who was ultimately unsuccessful.
Incidences of modern slavery reported to our Reporting Hotline	In the Reporting Period, there have been no incidents of modern slavery reported through our Ethics Hotline.
Number of staff received modern slavery training	In the Reporting Period, training was delivered to all staff on modern slavery as part of their annual mandatory Code of Conduct training.

We recognise that the absence of reports via the Ethics Hotline does not necessarily equate to the absence of risks or issues, but rather, it may be a reflection on how well the Hotline is understood, trusted or accessed by relevant stakeholders.

In our Modern Slavery Statement for the previous Reporting Period, the Reporting Entities indicated that they would seek to consider improvements to the way in which they considered modern slavery risks at supplier selection during the Reporting Period. As noted above, commencing in June 2024, Arc will be issuing the Modern Slavery Questionnaire to new suppliers that are classified as medium or high risk of modern slavery during the supplier onboarding process.

Within our next Reporting Period, the Reporting Entities will seek to:

- conduct a deep dive in relation to the suppliers in the cleaning and janitorial sector. The supply chain deep dive was a goal for Reporting Period however this has been the subject of further consideration to identify a salient risk area which we have now determined to be cleaners in regional areas.
- conduct a deep dive into the supply chain of the manufacturing of rollingstock being acquired by Arc offshore, specifically ballast wagons.
- issue the updated 2024 Modern Slavery Questionnaire to new and existing suppliers that fall into Arc's medium and high risk categories of modern slavery during the supplier onboarding process and continue to refine the Modern Slavery Questionnaire in conjunction with legal counsel.
- establish a framework to assess the level of compliance with our modern slavery clause, where relevant, and Supplier Code by suppliers. This was originally scheduled for completion within the Reporting Period. However, it has been postponed allowing for the collection of more comprehensive information on modern slavery awareness and compliance across our tier 1 supply chain through the on-going issuing of the 2024 Modern Slavery Questionnaire. Combined with the data already collected, this will enable us to complete the framework in the next Reporting Period.
- continue to identify supplier(s) operating in a higher risk sector with limited know-how in relation to modern slavery mitigation measures and work with them to increase their capabilities to assess and address modern

slavery risks in their operations and supply chains. We have identified four priority suppliers following the review of the Modern Slavery Questionnaire results.

In addition to the above, Arc intends to capture the results of the 2024 Modern Slavery Questionnaire in the next modern slavery statement and continue to engage with select suppliers with a higher modern slavery risk profile following our due diligence processes.

Process of consultation and approval

The Reporting Entities took a cross-functional approach to preparing and drafting this Statement. A consultation process involving discussions with members of core departments, as well as the Directors, of the Reporting Entities was undertaken. The board of each Reporting Entity was given an opportunity to consider and provide comments to the Statement prior to publication.

This Statement has been approved by the board of directors of BPIH on 25 June 2024 and Arc on 27 June 2024.

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Jonathon Sellar

Director

BPIH Pty Ltd

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Murray Cook Chief Executive Officer Arc Infrastructure Pty Ltd

Cross reference to the mandatory reporting criteria in the Modern Slavery Act 2018 (Cth)

Mandatory Criteria	Addressed in this Modern Slavery Statement within under the following headings and page numbers
Identify the reporting entity; Details of approval by the relevant principal governing body or bodies;	Background, page 2
Describe the process of consultation with any entities that the reporting entity owns or controls	Structure, operations and supply chains, page 3
	Process of consultation and approval, page 13
Describe the structure, operations and supply chains of the reporting entity	Structure, operations and supply chains, page 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	Modern Slavery Risks in Our Operations and Supply Chains, page 5
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	Our approach to mitigating modern slavery risks in our operations and supply chains, page 7
Describe how the reporting entity assesses the effectiveness of such actions	Assessing the effectiveness of actions taken, page 11