



Modern Slavery Statement

Financial Year 2020-2021

This statement is made in respect of Export Finance Australia (ABN 96 874 024 697) for the financial year ended 30 June 2021 (2020–2021). This statement has been prepared to comply with the reporting requirements under the Modern Slavery Act 2018 (Cth).

We are committed to continuously improving the way we identify and mitigate the risk of modern slavery occurring within our business operations, supply chain and customer relationships. This statement sets out our approach to modern slavery and how we are identifying and mitigating this risk.

The Export Finance Australia Board Audit and Risk Committee and Board have been provided an opportunity to consider and provide input into this statement.

This statement has been endorsed by the Board of Export Finance Australia and will be reviewed and updated annually.





James M Millar AM Chairman

29 November 2021

Swate Save

Swati Dave Managing Director & CEO

29 November 2021

Introduction

We recognise that modern slavery can be linked to other crimes and activities that adversely impact human rights, including bribery, corruption and environmental damage. We have a responsibility to respect human rights in our operations and activities as part of our responsible business conduct.

Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery involves serious exploitation of people and includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

About us

At Export Finance Australia, we provide financing solutions to support Australian exporters and overseas infrastructure development that delivers benefits to Australia.

We play a critical role for our customers and partners by using our commercial financing capability to support viable exporters and overseas infrastructure development when financing from the private sector is unavailable.

We work closely with banks, other financial institutions and partners, such as DFAT and Austrade, to support exporters and our international partners on their growth journey.

By doing so, we encourage and catalyse private market financing. Our mandate and capital base enable us to support a wide range of exporters, especially SMEs, finance overseas infrastructure development in the Indo-Pacific region and assist other government entities.

We help customers with financing solutions, which typically involve loans, bonds and guarantees. We deliver our support through our Commercial Account (CA) and the Government's National Interest Account (NIA) respectively.

Outside of our ordinary business of providing finance, we invest in securities and issue debt instruments to raise capital to deploy on our transactions. We issue debt instruments through professional capital market arrangers. Our investment in securities is limited to specific securities permitted by the Public Governance, Performance and Accountability Act 2013 (Cth) (PGPA Act) and associated instruments.

Our structure

As the Australian Government's export credit agency, we are an integral part of Australia's international trade focus supporting businesses, jobs and the community.

We are a corporate Commonwealth entity with an independent Board that is responsible for managing our affairs. This includes determining our strategy, defining our risk appetite and monitoring our performance.

We are governed by the Export Finance and Insurance Corporation Act 1991 (Cth) and the PGPA Act. Although we form part of the DFAT portfolio of agencies, we do not form part of any corporate group, nor do we own or control any other entities. Our responsible Minister is the Minister for Trade, Tourism and Investment.

Our legal corporation name under our legislation is Export Finance and Insurance Corporation, also known as Efic.

A breakdown of our governance structure, which is current as of November 2021, is set out in Figure 1: our governance structure.

Our remuneration strategy, structure and governance arrangements are detailed in our 2020-2021 Annual Report.

As at 30 June 2021, we had 102.5 permanent full-time equivalent employees. Our workforce profile and employee breakdown by location is set out in Figure 2: workforce profile.

Location

Our registered office is located at Level 10, 22 Pitt Street, Sydney NSW 2000.

FIGURE 1: OUR GOVERNANCE STRUCTURE

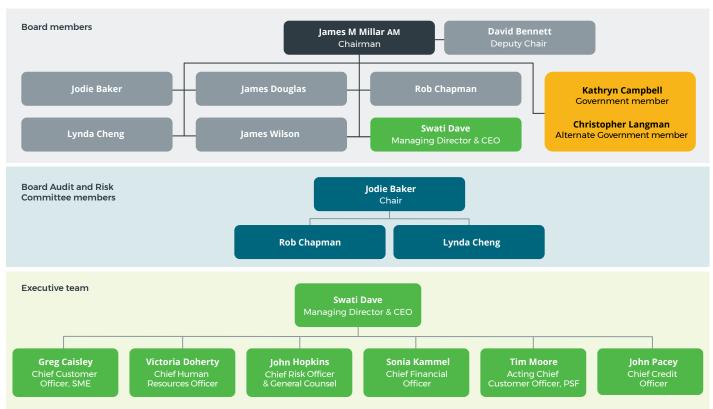
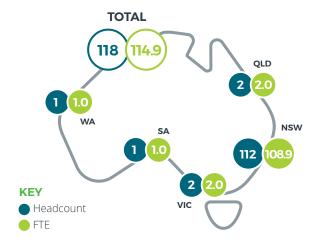


FIGURE 2: WORKFORCE PROFILE

Number of full-time equivalent employees

	30 June 2021	30 June 2020	30 June 2019
Permanent employees	102.5	99.5	87.9
Short-term employees <12 months	12.4	8.0	8

Employee location breakdown by state



Workforce diversity

Classification	Female	Male	Total	NESB ¹	ATSI ²	PWD ³
Support	14	7	21	9	3	0
Technical	20	20	40	28	0	0
Middle management	12	25	37	17	0	0
Leadership	9	11	20	4	0	1
Total	55	63	118	58	3	1

¹ NESB: Non-English-speaking background (persons who have migrated to Australia and whose first language is not English, and the children of such persons)

Our operations, supply chain and risks of modern slavery practices

We take a risk-based approach to modern slavery risk in our business operations, supply chain and customer relationships.

As we are an Australian-based entity and our primary operations of providing finance are office-based, we consider the risk of modern slavery occurring directly within our business operations to be low. However, we recognise that there is the risk of modern slavery occurring and being supported by us indirectly through our supply chain or via our customers and the transactions and projects we support.

In accordance with the *United Nations Guiding Principles on Business and Human Rights*, we have initially prioritised and continue to prioritise our focus and actions on areas where we consider the potential impact of modern slavery to be greatest and where we might have a greater opportunity to influence outcomes.

As such, at this stage our identification and assessment of modern slavery risk centres primarily on the financial transactions we support, rather than on Key Supplier Contracts. For context, the aggregate annual dollar value of our key supplier contracts for 2020–2021 was equivalent to around 1 per cent of the dollar value of our 2020–2021 transactional exposure.

In making the statements above, we have considered and contrasted the overall modern slavery risk profile of our customers and transactions with that of our supply chain.

We considered the following factors across two data sets: dollar value exposures/expenditures, jurisdictions and industries involved.

We consider our Key Supplier Contracts to be our key supplier engagements. These are representative of our core supply chain categories, set out below in Figure 3: supply chain categories - by dollar value.

As a general observation, the nature of our key supplier contracts tends to be more medium to long term rather than a large number of high turnover engagements. Around 14 per cent of our key supplier contracts were entered into in 2020–2021, with the remainder being ongoing contracts entered into in prior financial years.

FIGURE 3: SUPPLY CHAIN CATEGORIES - BY DOLLAR VALUE



² ATSI: Aboriginal or Torres Strait Islander background

³ PWD: People with disability

During 2020–2021, we continued to provide transparency for our Key Supplier Contracts by disclosing key details about them publicly on our website. We update this listing every six months.

In 2020–2021 there were 74 Key Supplier Contracts still being performed or entered into. Based on the value of these contracts, Australian-based suppliers comprised approximately 84 per cent, with the balance predominantly comprised of suppliers based in the USA, Ireland and the UK.

The percentage by number of the Key Supplier Contracts—rather than by value—was similar, with Australian-based suppliers constituting approximately 86 per cent. A breakdown of these figures is set out in Figure 4: 2020–2021 Key Supplier Contract jurisdictions by dollar value and Figure 5: 2020–2021 Key Supplier Contract jurisdictions by number of contracts.

In addition to our Key Supplier Contracts, we have in place property lease arrangements and other arrangements under which we receive services.

In 2020–2021, these arrangements were relatively small in number and value compared to our Key Supplier Contracts. They were typically entered into with Australian-based entities, including Australian Commonwealth entities. For these reasons, we consider these arrangements and engagements generally as lower risk and therefore have not included these items within our Key Supplier Contract Analysis.

The types of industries, jurisdictions and nature of our 2020–2021 CA and NIA transactional exposures reflect our role as a provider of financing solutions to support exporters and overseas infrastructure development. It also reflects the assistance we provide to other government entities.

Our 2020–2021 CA and NIA exposures are set out in Figure 6: 2020–2021 transaction exposure breakdown.

As noted above, we have identified our customer relationships and the transactions and projects we support as a continued priority for our focus and actions in this space.

FIGURE 4: 2020-2021 KEY SUPPLIER CONTRACT JURISDICTIONS BY DOLLAR VALUE



FIGURE 5: 2020-2021 KEY SUPPLIER CONTRACT JURISDICTIONS BY NUMBER OF CONTRACTS



Commercial Account

Our total exposure under our CA as at 30 June 2021 was \$1.7 billion. This included loans, guarantees, medium-term insurances, bonds and rescheduled credit insurance.

National Interest Account

Our total exposure under the NIA at 30 June 2021 was \$514.2 million, largely comprising loans to sovereign countries or their agencies, and loans to natural resource projects in emerging markets.

Our largest exposure was to the Independent State of Papua New Guinea, with exposure of US\$148.9 million (A\$198.3 million) as at 30 June 2021.

Further information on our business is available in our 2020-2021 Annual Report.

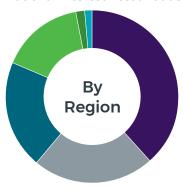
FIGURE 6: 2020-2021 TRANSACTION EXPOSURE BREAKDOWN

Commercial Account at 30 June 2021



Region	Value (\$m)	Value (%)
Australia	894.3	53.6
South America	241.1	14.5
Asia	193.4	11.6
Europe	123.9	7.4
North America	122.1	7.3
Pacific	81.4	4.9
Middle East	11.3	0.7

National Interest Account at 30 June 2021



Region	Value (\$m)	Value (%)
Pacific	198.3	38.6
Middle East	116.1	22.6
South America	104.2	20.2
Australia	80.1	15.6
Caribbean	8.8	1.7
Asia	6.7	1.3

Commercial Account at 30 June 2021



Value (\$m)	Value (%)
400.8	24.1
215.5	12.9
202.7	12.2
188.1	11.3
180.5	10.8
177.2	10.6
131.8	7.9
47.1	2.8
123.8	7.4
	400.8 215.5 202.7 188.1 180.5 177.2 131.8 47.1

National Interest Account at 30 June 2021



Industry sector	Value (\$m)	Value (%)
Sovereign	226.9	44.1
Mining - LNG	198.4	38.6
Manufacturing	40.3	7.8
Retail Trade	15.0	2.9
Financial and Insurance Services	8.8	1.7
Accommodation and Food Services	6.1	1.2
Sectors < \$5m	18.7	3.7

Our employees

We operate in a regulated environment and have policies and procedures around employment screening, employment conditions and appropriate workplace behaviour.

Our employees are encouraged to reflect on our culture and values when considering the spirit and letter of our policies and procedures, and to ask themselves:

- > Is this the right thing to do?
- How can I be a voice of integrity, and set a good example for others?
- > Will this produce the right outcome for us?
- > Would I act differently if it were my own property, money, information or reputation at stake?

Additionally, in 2020–2021 we participated in the Best Places to Work survey administered by WRK+. We were awarded an engagement score of 87 per cent and were recognised as a top 5 Best Places to Work 2021 for organisations with more than 100 employees.

These results demonstrate that our collective efforts on culture and engagement have had a positive impact on our employee experience.

Addressing the risk of modern slavery

Our governance framework

We have a number of policies, procedures and practices that help us identify, address and mitigate the risk of modern slavery occurring. This includes within our business operations, supply chain and customer relationships (including the transactions and projects we support).

These are outlined in Figure 7: policies and procedures.

Our Board reviews and approves key policies to ensure the ongoing effectiveness of our governance framework.

FIGURE 7: POLICIES AND PROCEDURES

Our policy / procedure	Description
Code of Conduct	Our Code of Conduct outlines the obligations and responsibilities of our employees, including in relation to standards of personal behaviour.
Anti-Corruption and Modern Slavery Policy	This policy sets out principles for our employees to follow in identifying and mitigating the risks of modern slavery occurring in our business operations, supply chain and customer relationships (including the transactions and projects we support).
	It also sets out key employee obligations in deterring and preventing bribery and corruption.
	Our Modern Slavery Initiatives and Anti-Corruption Initiatives are set out on our website.
Procurement and Contracts Governance Policy	This policy sets out how we procure goods and services and manage relationships with third parties across the supply lifecycle, including in accordance with the core principles of the Commonwealth Procurement Rules as applicable.
Contract risk assessment	This is a risk assessment tool for new supplier engagements and includes questions that allow us to assess potential risks with a new supplier, including any human rights or modern slavery issues potentially involved with its supply of goods or services to us.
	This assessment involves a two-step inherent risks and secondary risks assessment (the latter based on 'risk domains,' which may be triggered depending on the particular engagement).
	The risk domains include physical security, anti-bribery and corruption, health and safety, environmental and sustainability, human rights and subcontractor risks. A risk rating is allocated to each engagement to inform any procurement decisions, allowing us to adopt a risk-based approach.
Contract register	Our contracts governance function maintains a centralised register of all third-party contracts and produces reports as required.
Standard form supply	We use our standard form supply agreements where appropriate and as applicable.
contracts	These standard form agreements include certain modern-slavery related representations from suppliers, which apply at the time of entering into the agreement and during the term.

Our policy / procedure

Description

Environmental and Social Review of Transactions Policy and Procedure

Our Environmental and Social Review of Transactions Policy and Procedure incorporate two globally recognised approaches, being the OECD Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence and the Equator Principles.

We voluntarily apply the *Equator Principles*, a globally recognised benchmark used by many financial institutions to manage environmental and social risk in projects. These global standards apply only to certain kinds of transactions. As a matter of best practice, we extend the principles they embody to all our transactions (other than military equipment transactions which are subject to our Policy for Export of Military Equipment and Dual-use Goods).

When our screening and classification process identifies potential environmental or social impacts, we benchmark the project associated with the transaction typically against relevant Performance Standards of the International Finance Corporation, a member of the World Bank Group. Where a higher benchmarking standard is applicable to a particular transaction, we apply that higher standard. For transactions not directly related to a project, we may use other internationally recognised standards as the benchmark.

The Australian regulatory system is robust and captures compliance with the relevant Performance Standards of the International Finance Corporation through the application of its regulatory approvals process. For this reason, where a transaction supports a project located within Australia and relevant Australian government approvals have been obtained, we consider that the environmental and social benchmark has been met.

Each of these frameworks recognises human rights as part of their principles and risk assessment framework. These frameworks are accessible via our website.

Military equipment and dual-use goods

We support the Australian Government's objective of fostering a defence exports industry in Australia and administer the Defence Export Facility. Transactions supporting the financing of military equipment are considered under a Board-approved policy covering the export of military equipment and dual-use goods (exports that could be adapted for military use).

Defence Export Controls (DEC) is responsible to the Minister for Defence and regulates the export of defence and strategic goods and technologies. Our policy requires that our support for exports of military equipment from Australia must have a valid export permit from DEC. DEC assesses applications based on five key criteria to assess the exportability of defence and strategic goods, including human rights.

Our due diligence approach to military equipment transactions is available on our website.

Human Rights Statement

This statement considers our obligations to fulfil Australia's human rights obligations. We incorporate internationally recognised human rights relevant to our operations in accordance with the United Nations Guiding Principles on Business and Human Rights.

This statement is accessible via our website.

Transactional Anti-Bribery and Corruption Procedures

This document sets out the procedures, including due diligence procedures, that our employees need to follow to comply with our obligations under the OECD Council Recommendation on Bribery and Officially Supported Export Credits, and to help deter, detect and prevent bribery and corruption in international business transactions.

These procedures set out:

- > our requirements for contractual provisions and safeguards in our financing documentation in relation to bribery, corruption, sanctions, anti-money laundering and counter-terrorism financing and modern slavery, as applicable in accordance with our risk-based approach;
- > our requirements for obtaining anti-bribery declarations from our customers and relevant parties as applicable. These declarations provide certifications about not having engaged, and not engaging in, bribery and require certain disclosures, including around the use of agents and commissions. Our Anti-Bribery Declarations also help raise awareness of the OECD Guidelines for Multinational Enterprises.

While we recognise that contractual safeguards may not always fully operate to prevent a breach, we consider that they act as a strong deterrent. We would consider exercising our rights under our transaction financing documentation if this was the appropriate response in relation to an identified risk.

In some circumstances, enhanced due diligence will be required to be undertaken on transactions.

Our policy / procedure	Description
Anti-Money Laundering	We have in place an Anti-Money Laundering and Counter-Terrorism Financing Program.
and Counter-Terrorism Financing (AML/CTF)	Our Transaction Risk Assessment is a tool we use to assess the risk of our transactions. The Transaction Risk Assessment encompasses:
Program and Transaction Risk Assessment	 anti-money laundering and counter-terrorism financing due diligence on our customers as applicable. 'Know Your Customer' checks are done, and certain information is collected and verified;
	 a broader risk assessment of the transaction is completed, including in relation to bribery, corruption, sanctions and adverse media on our customer and other key parties involved in the transaction as applicable.
	In some circumstances, enhanced due diligence will be required to be undertaken.
Incident and Issue Reporting Policy	This policy establishes an internal reporting process for employees to report risk and compliance issues and incidents that are not public interest disclosures and provides a framework for the investigation and resolution of these.
Work health and safety	We have policies and procedures in place to ensure the health and safety of our employees is considered and managed. This includes our Health and Safety Management Arrangements, a Work Health and Safety Risk Control Matrix, and a Hazard and Incident Reporting procedure adopted by the Work Health and Safety Committee.
Public Interest Disclosure ("Whistleblower") Policy and Procedure	This policy and procedure provide mechanisms for 'public officials' as defined under the <i>Public Interest Disclosure Act 2013</i> (Cth) to report conduct engaged in by an agency, public official or contracted service provider in connection with a Commonwealth contract that involves alleged wrongdoing or illegal or improper conduct.
Complaints Policy	Our Complaints Policy provides an avenue for our customers, suppliers, third parties or any member of the public to lodge a complaint with us. It also sets out how a complaint can be referred to the Commonwealth Ombudsman by a complainant.
Internal audit program	We have a supply agreement with a professional services provider for internal audit services under which relevant audits and reviews are completed against a Board Audit and Risk Committee endorsed and Board approved audit plan.
Compliance training	We have a mandatory ongoing compliance training program that our employees must complete annually, which incorporates training modules in accordance with our Compliance Plan for the relevant year. In 2020–2021, this included a modern slavery training module, which was designed specifically for our business.
Law enforcement and regulator relationships	We share information with AUSTRAC, the Australian Federal Police and other relevant agencies and regulators in accordance with applicable laws and our policies and procedures, including where we suspect criminal activity has occurred or may occur.

How we assess the effectiveness of our actions

We are continuously seeking to improve our policies, procedures and actions in relation to modern slavery. Measures monitored for 2020–2021 include the following:

Focus Area	Measure	Number
Human rights training	% of permanent FTE employees completing modern slavery training.	100%
	% of permanent FTE employees completing whistleblower awareness training.	100%
	% of permanent FTE employees completing anti money-laundering and counter-terrorism financing training.	100%
	% of permanent FTE employees completing fraud awareness training.	100%
	% of permanent FTE employees completing anti-bribery and corruption training.	100%
Supply chain transparency	% of contracts entered into with a value of \$100,000 (incl. GST) or more and details of which are published on our website.	100%
Multi-stakeholder forums	No. of multi-stakeholder forums held with civil society organisations regarding the environmental and social aspects of our transactions.	1
Reports – modern slavery	No. of public interest disclosure (whistleblower) reports received about modern slavery.	0
Reports – other environmental, social and corruption	No. of public interest disclosure (whistleblower) reports received about other environmental, social and corruption matters.	0
Issues or incidents raised – modern slavery	No. of issues or incidents raised under our Incident and Issue Reporting Policy in relation to potential transaction supply chains.	1
Complaints – modern slavery	No. of public complaints received about modern slavery.	0
Complaints – other environmental, social and corruption	No. of public complaints received about other environmental, social and corruption matters.	0
Procurement risk assessment	In 2020–2021, enhancements were made by our contracts governance function to our contract risk assessment tool to enhance supplier screening.	-
Supplier conduct	In 2020–2021, we introduced a new supplier code of conduct as a statement of values that we expect our suppliers to comply with and to guide them in their responsibilities in relation to combatting modern slavery. We have published this on our website.	-
Enhanced Transactional Anti-Bribery and Corruption Procedures	In 2020–2021, we reviewed and updated our Anti-Bribery Declarations, standard financing documentation contractual provisions and Transactional Anti-bribery and Corruption Procedures.	-
	This was to ensure they remain appropriate and fit for purpose, and that our risk-based approach remains reasonable and proportionate in the current climate. The process included seeking and incorporating feedback from an internal working group established for this purpose.	

Focus Area	Measure	Number
Anti-Corruption and Modern Slavery Policy	We have reviewed, updated and consolidated our Anti-Corruption and Modern Slavery Policy to ensure it remains appropriate and fit for purpose, and that our risk-based approach remains reasonable and proportionate. Our board has endorsed these updates.	-
External engagement - Bribery Prevention Network	The Bribery Prevention Network is a public-private partnership that brings together business, civil society, academia and government with the shared goal of supporting Australian businesses to prevent, detect and address bribery and corruption and promote a culture of compliance.	-
	We have been involved through our representative acting in an advisory capacity to the network. In 2020–2021, we have continued to promote greater bribery and corruption awareness amongst Australian businesses by leveraging our website, our anti-bribery declarations, and through training of our employees.	
External engagement - OECD	We continued to work with the OECD on key areas including in relation to bribery prevention and environmental and social matters. We actively participated and collaborated with other export credit agencies on the implementation of anti-bribery measures under the OECD Recommendation of the Council on Bribery and Officially Supported Export Credits.	-
Environmental and social	We continued to:	-
risk assessment	 focus on assessing potential human rights and modern slavery risks in our transactions as part of our Environmental and Social Review of Transactions Policy; 	
	 report our Category A transactions on our website and seek stakeholder feedback for projects outside Australia prior to a final decision to support a project. 	

Future commitments

Continuous improvement

We plan to continue the following actions in 2021–2022 to further identify, mitigate and combat modern slavery risks:

Focus area	Measure
Our supply chain	
Procurement risk assessment	Continue to assess new suppliers through our Contract Risk Assessment process and monitor the effectiveness of this process.
Supply chain transparency	Continue to provide transparency around our supply chain by publishing on our website (twice a year) a list of all supply contracts being performed or entered into within the previous 12 months with a value of \$100,000 (incl. GST) or more.
Our transactions	
Enhance Transactional Anti-Bribery and Corruption Procedures	We will review and update our <i>Transactional Anti-Bribery and Corruption Procedures</i> to ensure there is a clear risk-based escalation mechanism to senior management for any material concerns relating to a customer, transaction or project, including around modern slavery issues and procurement processes (in addition to existing escalation mechanisms, including under the Issue and Incident Reporting Policy and as part of the Transaction Risk Assessment process).
Transaction Risk Assessment	We are continuing our work commenced in 2019–2020 evaluating enhancements to our Transaction Risk Assessment due diligence system.
External engagement - Bribery Prevention Network	In 2021–2022, we will continue to be involved in an advisory capacity to the Network. We will continue to leverage our engagement to promote greater awareness among Australian businesses (including SMEs) in detecting, preventing and addressing bribery and corruption, particularly when dealing with overseas jurisdictions.
External engagement - OECD	We will continue to work with the OECD on key areas including in relation to further implementation of the OECD Recommendation of the Council on Bribery and Officially Supported Export Credits and in relation to responsible business conduct.
	We will continue to promote awareness around preventing and addressing bribery and corruption with our customers.
Environmental	We will continue to:
and social risk assessment	 focus on assessing potential human rights and modern slavery risks in our transactions as part of our Environmental and Social Review of Transactions Policy;
	 report our Category A transactions on our website and seek stakeholder feedback for projects outside Australia prior to a final decision to support a project; and
	 monitor our transactions, including through periodic reviews as required by our policies and procedures, and engaging or escalating to internal stakeholders as applicable.
Other	
Training	We will continue to provide:
	> training to our employees on modern slavery, anti-money laundering and counter-terrorism financing and anti-bribery and corruption;
	additional targeted training on modern slavery to frontline employees on how to identify and address potential issues of concern, and how to work with stakeholders including our customers to achieve positive overall outcomes from a modern slavery perspective.
Complaints Policy	We will review and update our Complaints Policy with the overarching aim of ensuring it is accessible to all of our stakeholders, including members of the public who have an interest in our affairs and transactions. We will communicate to all employees our updated complaint handling policy, procedure and practices and the importance of these.
	We will also consider whether our website feedback channel remains easy to access and utilise, understanding that feedback has the potential to help us grow as an organisation.

Definitions

In this statement:

DFAT means the Department of Foreign Affairs and Trade.

Key Supplier Contracts means our third-party contracts with suppliers valued at \$100,000 or more (GST inclusive), which were still being performed during 2020–2021, or were entered into in 2020–2021. It does not include lease arrangements and Commonwealth entity contracts.

OECD means the Organisation for Economic Cooperation and Development.

SMEs means small and medium-sized enterprises.

Appendix 1

Mandatory reporting criteria

This statement complies with the mandatory criteria for the Australian *Modern Slavery Act 2018* (Cth). The following table references the content in this statement which complies with the mandatory criteria:

Modern Slavery Act Mandatory Criteria	Page reference
Identify the reporting entity	3
Describe the reporting entity's structure, operations and supply chains	3-7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	4-7
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	7-9
Describe how the reporting entity assesses the effectiveness of these actions	10-11
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)	Not applicable
Any other relevant information	12



