



Australian Government

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Modern Slavery Statement

Financial Year ending 30 June 2024

This statement is made in respect of Export Finance Australia (ABN 96 874 024 697) for the financial year ending 30 June 2024 (FY2024). 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 was approved by the Board of Export Finance Australia in their capacity as the principal governing body of Export Finance Australia and will be updated annually.



Debra Hazelton

Debra Hazelton
Chair

10 December 2024

John Hopkins

John Hopkins
Managing Director & CEO

10 December 2024

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

We are Australia's export credit agency (ECA).

We provide finance to support export trade and overseas investment and infrastructure development. From small and medium sized enterprises (SMEs) to large corporates, foreign governments and infrastructure projects, we help Australian businesses take on the world. In doing so, our finance supports Australia's economic security and regional resilience.

We administer the Australian Government's National Interest Account (NIA), which currently includes the Critical Minerals Facility (CMF), the Defence Export Facility (DEF), the Southeast Asia Investment Financing Facility (SEAIFF) and loans for the Australian Infrastructure Financing Facility for the Pacific (AIFFP).

We also provide services to other Commonwealth entities including the AIFFP, Housing Australia, the National Reconstruction Fund Corporation (NRFC) and the Northern Australia Infrastructure Facility (NAIF).

Outside of our ordinary business of providing finance, we invest in securities and issue debt instruments to raise capital to support 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 Department of Foreign Affairs and Trade (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 and Tourism (as at 30 June 2024).

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

have legislative authority to operate under the name Export Finance Australia.

A breakdown of our governance structure, which is current as of 30 June 2024, is set out in Figure 1: Our governance structure.

Our remuneration strategy, structure and governance arrangements are detailed in our FY2024 Annual Report. As at 30 June 2024, we had 147 permanent full-time equivalent employees. Our workforce profile is set out in Figure 2: Workforce profiles 30 June 2024.

Location

Our registered office is located at Level 11, 22 Pitt Street, Sydney NSW 2000.

Figure 1: Our governance structure (as of 30 June 2024)



Figure 2: Workforce profiles 30 June 2024

Number of employees

	30 June 2024	30 June 2023	30 June 2022
Permanent employees (ongoing)	147	131	113
Fixed Term (non-ongoing)	13	12	9

Export Finance Australia employee diversity profile 30 June 2024

Classification	Female	Male	Other	Total Employees	Non-English Speaking Background (NESB2) ¹	Aboriginal and Torres Strait Islander	People with disability
Leadership	14	13	0	27	6	0	0
Middle Management	14	30	0	44	20	0	0
Technical	28	30	0	58	34	0	1
Support	16	14	1	31	13	1	0
Total	72	87	1	160	73	1	1

¹ NESB2 – Parents from a Non-English speaking background.

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 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, 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 FY2024 was equivalent to around 1 per cent of the dollar value of our FY2024 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 consider our third-party contracts with suppliers valued at \$100,000 or more (GST inclusive) which were still being performed during FY2024 or which were entered into during FY2024 (excluding lease arrangements and Commonwealth entity contracts) to be our Key Supplier Contracts. These are representative of our core supply chain categories, set out below in Figure 3: Supply chain categories by dollar value.

Most professional services, advisory, travel and ICT services are procured through pre-approved Commonwealth Government Vendor Panels. The Commonwealth Government's platform for ICT services, the BuyICT platform, includes information prompts on modern slavery, including in the quote request. The Commonwealth Government Management Advisory Services Panel (which we will shortly join), assesses modern slavery risks as part of request for tender processes.

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 33 per cent of our Key Supplier Contracts were entered into in FY2024, with the remainder being ongoing contracts entered into in prior financial years.

During FY2024, 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 FY2024 there were 99 Key Supplier Contracts still being performed or entered into. Based on the value of these contracts, Australian-based suppliers comprised approximately 90 per cent, with the balance predominantly comprised of suppliers based in the USA, Ireland, UK and Singapore which are considered low risk jurisdictions.

The percentage by number of the Key Supplier Contracts rather than by value was similar, with Australian-based

suppliers constituting approximately 96 per cent. A breakdown of these figures is set out in Figure 4: FY2024 Key supplier contract jurisdictions by dollar value and Figure 5: FY2024 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 FY2024, 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 FY2024 Commercial Account (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 FY2024 CA and NIA exposures are set out in Figures 6 to 9.

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 3: Supply chain categories by dollar value

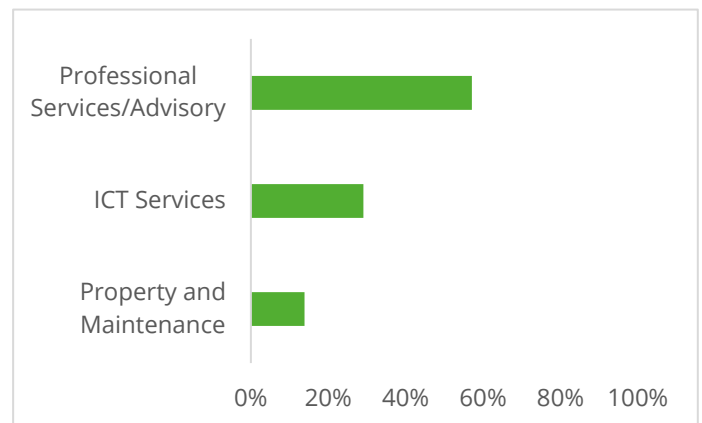


Figure 4: FY2024 Key supplier contract jurisdictions by dollar value

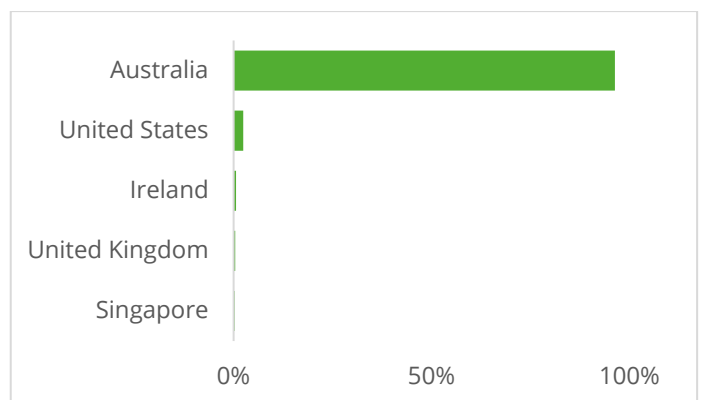
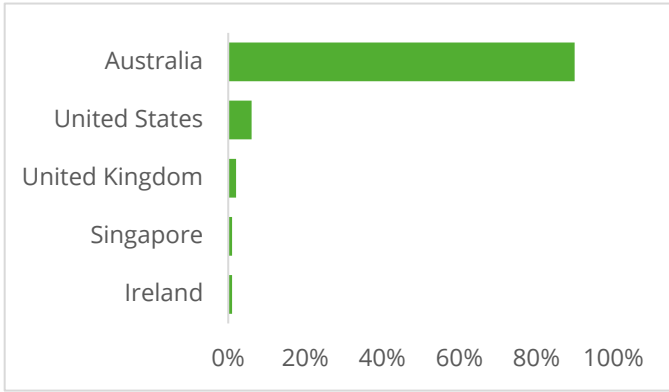


Figure 5: FY2024 Key supplier contract jurisdictions by number of contracts



National Interest Account

Our total exposure under the NIA as at 30 June 2024 was \$3.7 billion comprising loans in emerging markets and to sovereign countries or their agencies.

Our largest exposures include Telstra PM Pty Ltd with US\$1.8 billion (A\$2.7 billion), PsiQuantum with US\$125 million (A\$188.7 million), Iluka Resources with A\$151.3 million, the Independent State of Papua New Guinea with US\$79.5 million (A\$120.1 million) and Papua New Guinea LNG with US\$73.2 million (A\$110.5 million).

Further information on our business is available in our FY2024 Annual Report.

Commercial Account

Our total exposure under our Commercial Account as at 30 June 2024 was \$1.8 billion which included loans, guarantees and bonds.

Transaction Exposure Breakdowns

Figure 6: Commercial Account at 30 June 2024 – exposure by region

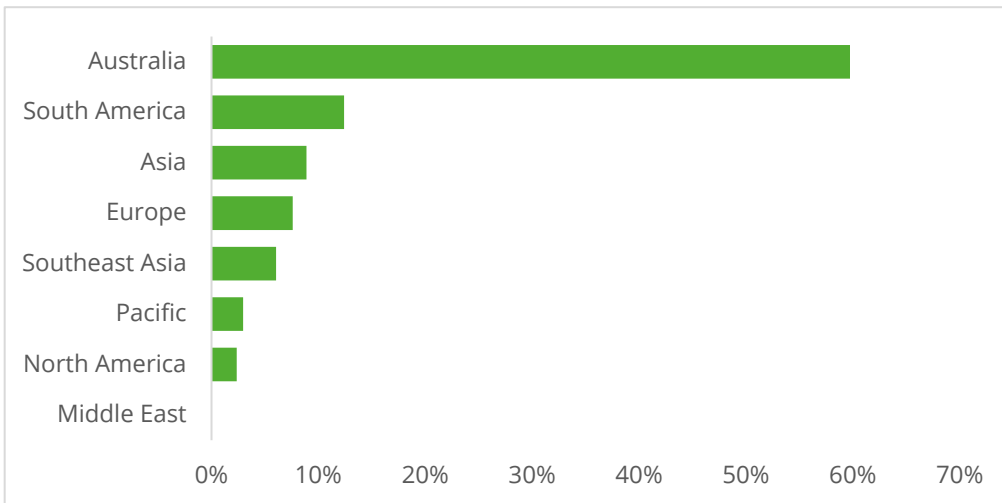


Figure 7: Commercial Account at 30 June 2024 – exposure by industry sector

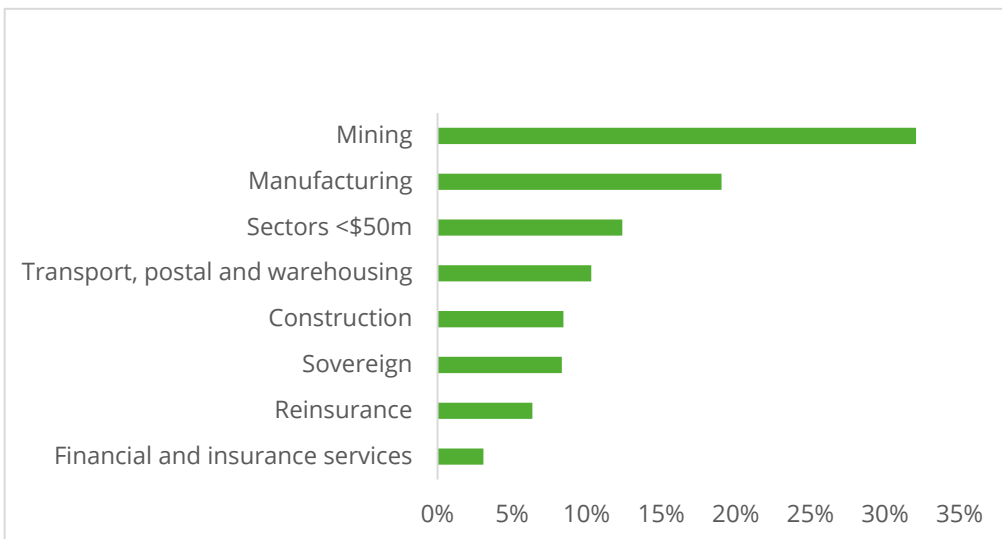


Figure 8: National Interest Account at 30 June 2024 – exposure by region

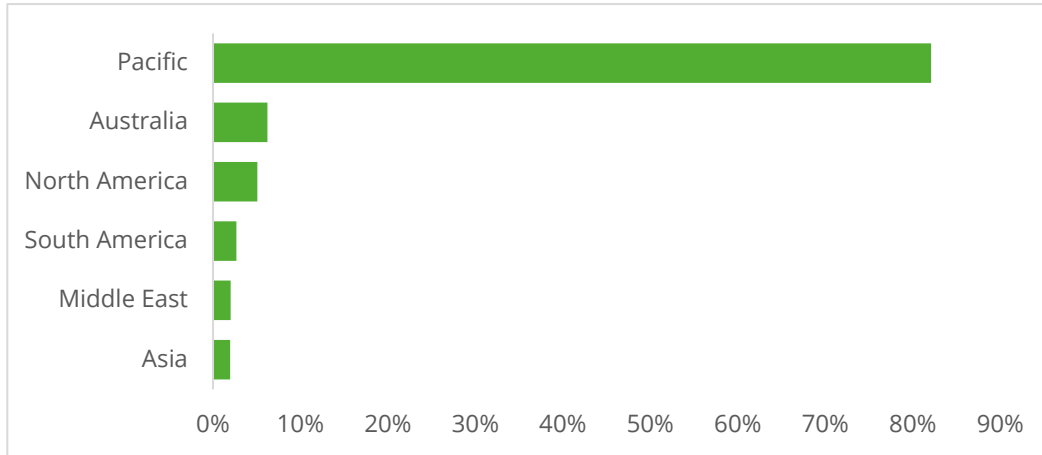
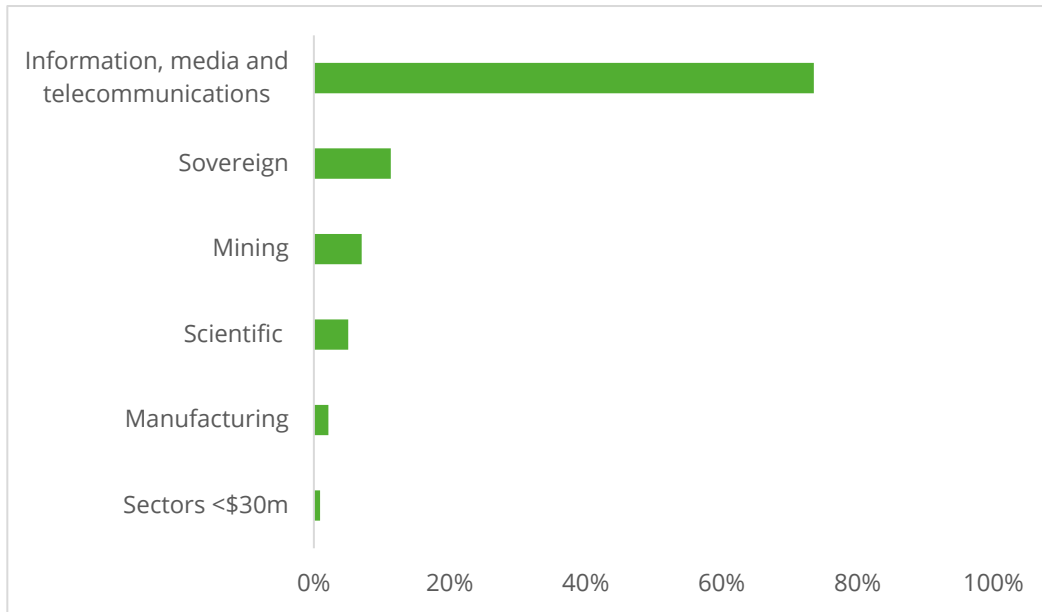


Figure 9: National Interest Account at 30 June 2024 – exposure by industry sector



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?

We regularly participate in external employee surveys that measure our workplace culture and behaviours. Our 2024 Great Place to Work results reinforce our strong commitment to creating an ethical, safe and inclusive workplace. This is evidenced by the psychological healthy workplace, approachable leadership and ethical leadership questions gaining percentage scores in the 90s.

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 the following section: Policies and procedures. Our Board reviews and approves key policies to ensure the ongoing effectiveness of our governance framework.

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.
Modern Slavery Policy	<p>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).</p> <p>In FY2024, the Board approved the separation of this policy from the Anti-Bribery & Corruption Policy.</p>
Anti-Bribery & Corruption Policy	<p>Our Anti-Bribery & Corruption Policy sets out key employee obligations in deterring and preventing bribery and corruption. Our commitment to anti-corruption is further detailed on our website.</p> <p>In FY2024, the Board approved the separation of this policy from the Modern Slavery Policy.</p>
Procurement and Contracts Governance Policy	<p>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 (CPRs), as applicable.</p> <p>This policy also provides tools and guidance in relation to achieving the key objectives of the CPRs, those being value for money, encouraging competition amongst suppliers, ensuring accountability, transparency and integrity, and managing risk during the procurement and contract management lifecycle (Procure, Contract, Manage and Review).</p>
Contract Risk Assessment	<p>This is a risk assessment tool that includes questions that allow us to assess potential risks with a supplier, including any human rights or modern slavery issues potentially involved with its supply of goods or services to us.</p> <p>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).</p> <p>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.</p>
Contract register	Our contracts governance function maintains a centralised register of our Key Supplier Contracts. The contract register contains contracts Export Finance Australia has entered into with third-parties for the provision of goods and/or services. It also facilitates amendments to contracts, such as variations, extensions and terminations, as they arise.
Standard financing documentation	In FY2024, standard financing documentation contractual provisions were updated to ensure they remain appropriate and fit for purpose, and that our risk-based approach remains reasonable and proportionate in relation to management of modern slavery risks.
Standard form supply contracts	<p>We use our standard form supply agreements where appropriate and as applicable.</p> <p>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.</p> <p>In July 2024 updates to the standard form supply agreement were finalised to include a reference to the revised Commonwealth Supplier Code of Conduct.</p>
Environmental and Social Review of Transactions Policy and Procedures	<p>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.</p> <p>We are a signatory to 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).</p> <p>When our screening and classification process identifies potential environmental or social</p>

Our policy / procedure	Description
	<p>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.</p> <p>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 generally been met.</p> <p>Each of these frameworks recognises human rights as part of their principles and risk assessment framework. These frameworks are accessible via our website.</p>
<p>Military Equipment and dual-use Goods</p>	<p>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).</p> <p>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.</p> <p>Our due diligence approach to military equipment transactions is available on our website.</p>
<p>Human Rights Statement</p>	<p>This statement considers our obligations to fulfill 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.</p> <p>This statement is accessible via our website.</p>
<p>Supplier Code of Conduct</p>	<p>Our Supplier Code of Conduct is a statement of values that we expect our suppliers to comply with and to use to guide them in their responsibilities in relation to combatting modern slavery. It also clearly articulates that our suppliers must make all reasonable efforts to ensure that parties involved in their supply chain are not engaged in modern slavery.</p> <p>The Supplier Code of Conduct is published on our website.</p>
<p>Anti-Money Laundering and Counter-Terrorism Financing Program and Transaction Risk Assessment</p>	<p>We have in place an Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Program. Our AML/CTF Program takes a holistic financial crime compliance approach and is implemented through our Transaction Risk Assessment process, in accordance with our regulatory obligations. The Transaction Risk Assessment process includes:</p> <ul style="list-style-type: none"> - ‘Know Your Customer’ checks as part of our Customer Due Diligence process; - a broader assessment of transaction risks including money laundering, terrorism financing, sanctions, bribery, corruption, modern slavery as well as other reputation risks in relation to our customer and other key parties involved in the transaction as applicable; and - ongoing Customer Due Diligence and transaction monitoring. <p>As part of the Transaction Risk Assessment process, we obtain anti-bribery disclosures from our customers and relevant parties as applicable, in accordance with our obligations under the OECD Council Recommendation on Bribery and Officially Supported Export Credits. These disclosures provide certifications about not having engaged, and not engaging in bribery, and cover the use of agents and commissions. Relevant parties making the disclosures are made aware of the Modern Slavery Act 2018 (Cth) and its requirements as well as the OECD Guidelines for Multinational Enterprises.</p> <p>In FY2024, we implemented significant enhancements to our AML/CTF Program and new Transaction Risk Assessment systems, tools and processes.</p>
<p>Incident and Issue Reporting Policy</p>	<p>This policy establishes an internal reporting process for employees to report issues and incidents that are not public interest disclosures and provides a framework for the investigation of these.</p>

Our policy / procedure	Description
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 Policy and Procedures	This policy and procedures provide mechanisms for 'public officials' as defined under the Public Interest Disclosure Act 2013 (Cth) (PID Act) 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. In FY2024, the Board approved this policy and procedures with updates made following PID Act amendments and the commencement of the National Anti-Corruption Commission.
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 an audit plan which is endorsed by the Board Audit and Risk Committee and approved by the Board.
Compliance training	We have a mandatory ongoing compliance training program that our employees must complete annually, which incorporates training modules for the relevant year. In FY2024, this included a training module on modern slavery.
Law enforcement and regulator relationships	Where required, 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.
External Engagement - OECD	We continued to work with the Organisation for Economic Cooperation and Development (OECD) on key areas including in relation to anti-bribery and environmental and social matters. Export Finance Australia participated with other export credit agencies on anti-bribery measures under the Recommendation of the Council on Bribery and Officially Supported Export Credits. An Export Finance Australia representative is on the Australian National Contact Point (AusNCP) Board. This serves as an initiative to help raise awareness of the OECD Guidelines for Multinational Enterprises.

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 FY2024 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 awareness and 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 (GST inclusive) or more and where details are published on our website.	100%
Reports – Modern Slavery	No. of public interest disclosure reports received about modern slavery.	0
Reports – Other Environmental, Social and Corruption	No. of public interest disclosure reports received about other environmental, social and corruption matters.	0
Issues or incidents raised – Modern Slavery	No. of issues or incidents raised under our internal Incident and Issue Reporting Policy in relation to potential transaction supply chains.	1 ²
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

² Note that this was a matter reported to us by a borrower relating to one of its suppliers and was detected through an independent third-party audit. Corrective action was implemented by the supplier.

Future commitments

Continuous improvement

We plan to continue the following actions in FY2025 to further identify, mitigate and combat modern slavery risks:

Focus Area	Measure
Our Supply Chain	
Procurement Risk Assessment	<p>Continue to assess suppliers through our Contract Risk Assessment process. This will mitigate the risk of Export Finance Australia engaging suppliers that may have been involved in any critical events or have been the subject of any adverse media.</p> <p>Review and update the Contract Risk Assessment process with further focus on modern slavery and human rights related areas.</p>
Supply Chain Transparency	<p>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 (GST inclusive) or more (Senate Order for Entity Contracts (Murray Motion)).</p>
Procurement Framework and Processes	<p>Bolster our procurement capability and consider enhancements to our procurement framework and processes.</p> <p>Increasing the usage of pre-approved Commonwealth Government Vendor Panels. These panels have been established by way of evaluating (amongst other criteria) the vendors' credentials and ability to provide goods and/or services in an ethical manner. We are continuing to understand the level of modern slavery assessment that the Commonwealth Government Vendor Panels conduct on vendors before a vendor is authorised to join the panel and on an ongoing basis.</p> <p>We are also undertaking a review of our Supplier Code of Conduct (which sets out expectations for our Suppliers on their supply chains) and our Supplier Standard Agreements.</p>
Our Transactions	
Transaction Risk Assessment	<p>Having implemented new Transaction Risk Assessment systems, tools and processes in FY2024, in accordance with our risk-based approach we will continue to strengthen our enhanced due diligence, ongoing monitoring and assessment of broader transaction, industry and jurisdiction risks including in relation to modern slavery.</p>
External engagement - OECD	<p>We will continue to work with the OECD on key areas including in relation to further implementation of the OECD Council Recommendation on Bribery and Officially Supported Export Credits and in relation to responsible business conduct.</p> <p>We will continue to promote awareness around preventing and addressing bribery and corruption with our customers.</p>

Focus Area	Measure
Environmental and social risk assessment	<p>We support the efforts of DFAT’s strategy ‘Australia’s international engagement strategy on human trafficking and modern slavery: Delivering in partnership’. The International Engagement Strategy provides a comprehensive and coordinated framework to inform Australia’s international efforts to help eradicate human trafficking and modern slavery, with a focus on the Indo-Pacific region. Export Finance Australia will support the strategy through our own efforts to promote awareness and by taking effective action to identify and mitigate the risk of modern slavery.</p> <p>We will continue to:</p> <ul style="list-style-type: none"> - focus on assessing potential human rights and modern slavery risks in our transactions as part of our Policy for Environmental and Social Review of Transactions; - undertake site visits including overseas; - report our Category A³ projects in line with the OCED Recommendation of the Council on Common Approaches for Officially Supported Export Credits 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 by requiring periodic reviews as required by our policies and procedures, and engaging or escalating to internal stakeholders as applicable.
Other	
Training	<p>We will continue to provide:</p> <ul style="list-style-type: none"> - new joiner and annual training to our employees on modern slavery, anti-money laundering and anti-bribery and corruption; and - additional targeted training on modern slavery and financial crime 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. <p>We will continue to monitor that contractors of more than 3 months’ tenure complete all assigned training.</p>
Staff awareness	<p>We will establish a working group consisting of representatives from various internal teams that will meet quarterly to:</p> <ul style="list-style-type: none"> - consider and track progress of commitments; - make recommendations with respect to improvements in the management of modern slavery risks; - provide guidance on policies and procedures; - monitor effectiveness of frameworks; - assess any changes to Modern Slavery Act 2018 (Cth) and how to implement these changes; and - promote key modern slavery messages within our organisation and to our counterparties. <p>We will continue to update our intranet page for Modern Slavery including adding resources and training materials for staff.</p>

³ Category A projects are those that we consider to have potential for significant adverse environmental and/or social impacts. Refer to our website for further details.

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:

<i>Modern Slavery Act 2018</i> (Cth) Mandatory Criteria	Page reference
16(1)(a) Identify the reporting entity	3
16(1)(b) Describe the reporting entity's structure, operations and supply chains	3-9
16(1)(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	6-9
16(1)(d) 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	10-12
16(1)(e) Describe how the reporting entity assesses the effectiveness of these actions	13
16(1)(f) 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
16(1)(g) Any other relevant information	14-15



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