



# Modern Slavery Statement

For the period 1 July 2023 to 30 June 2024

Allens acknowledges the Traditional Owners of Country throughout Australia, on whose lands we live and work. We pay our respects to Aboriginal and Torres Strait Islander peoples, their stories and their continuing cultures, and to Elders, past and present.

This is the fifth modern slavery statement<sup>1</sup> made and published jointly on behalf of the reporting entities, Allens (ABN 47 702 595 758), an Australian partnership providing legal services, and Allens Operations Pty Limited (ABN 87 004 992 607) as trustee for the Allens Operations Trust (*Allens Operations*) providing support services to the Australian partnership.

References to ‘we’, ‘our’ and the ‘firm’ cover the reporting entities, any entities they own or control and any associated entities.

This statement is made in compliance with the *Modern Slavery Act 2018* (Cth) (the **Act**) with respect to the financial year ending 30 June 2024.

<sup>1</sup> For completeness, and to comply with the reporting requirements in the Act, where our structure, operations, supply chain and processes have remained the same during the reporting period, some information has been re-stated from previous statements.

## 1.1 Our commitment

We are committed to taking action to assess and address modern slavery risks in our operations and supply chain. We seek to apply a consistent approach to the management of modern slavery risks across all of the firm's offices and business operations. In this modern slavery statement we describe the steps we have taken during the reporting period, and actions we plan to take to continually improve our approach.

Allens was a foundation signatory to the United Nations Global Compact in 2001, and our continuing goal is to promote and uphold the Compact's 10 principles including those relating to human rights and labour standards. We also seek to promote Sustainable Development Goal 8.7 in relation to the eradication of forced labour, modern slavery and human trafficking.

## 1.2 Our structure and operations

Allens is a leading international law firm providing legal services to clients in the public, private and not-for-profit sectors across a wide range of legal practice areas including:

- Corporate
- Projects & Development
- Disputes & Investigations
- Banking & Finance
- Tax
- Competition, Consumer & Regulatory
- Intellectual Property and Patent & Trade Mark Attorneys

The firm has offices in Australia (Brisbane, Melbourne, Perth and Sydney), Vietnam (Ho Chi Minh City and Hanoi), Singapore and Papua New Guinea (Port Moresby). In Australia, Allens operates as a partnership. Allens is a local partnership in Papua New Guinea and our offices in Singapore and Vietnam are locally licensed. Allens Operations is a separate service entity that provides support services to Allens' legal practice.

Allens has an international alliance with global law firm Linklaters LLP. The complementary practices of Allens and Linklaters LLP provide clients with access to a global network, while operating independently.

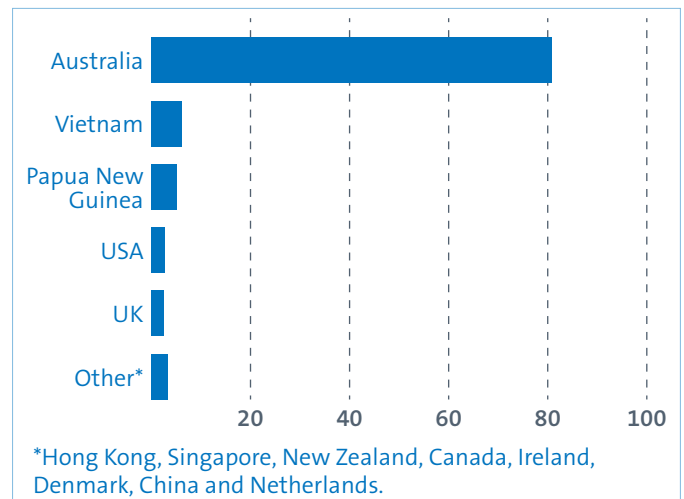
As at 30 June 2024, we had a total headcount of approximately 1870 people including partners, lawyers, practice support and corporate services staff. The majority of our people, approximately 96%, are based in our Australian offices and 4% are based in our Asia Pacific offices.

We contract some lawyers as part of Allens Adapt, our flexible resourcing program, and we also engage people on a contract basis to carry out the managed document review service we provide for clients. To support short-term business needs, including in connection with catering services and events, we engage other professional staff on a contract basis, or temporary agency staff.

## 1.3 Our supply chain

We source products and services from a range of suppliers to support the provision of our legal services and the business operations of our firm.

During the reporting period, the firm procured products and services from over 880 direct suppliers<sup>2</sup>. The geographical distribution of these suppliers is indicated in the graph below, with the majority (approximately 80%) based in Australia.



The firm's main procurement categories (based on spend) in FY24 were:

- business operations (including leasing and facilities management);
- information and communications technology and services;
- professional services (including insurance);
- human resources;
- knowledge services
- business travel; and
- marketing and events.

These procurement categories are drawn from reviewing our accounts payable records. We have continued to expand our review of direct suppliers to include firm-issued credit card transactions.<sup>3</sup> We reviewed the top 125 suppliers by spend, which represents approximately 50% of the total firm-issued credit card transactions (by spend) during the reporting period. The direct suppliers included within this review are primarily in the business travel and entertainment sectors and located in low risk countries, with the majority (approximately 80%) located in Australia.

We acknowledge that our supply chain extends beyond our direct suppliers and we continue to consider the role of indirect suppliers in higher risk categories.

<sup>2</sup> This supplier analysis includes suppliers recorded in our accounts payable system, but does not include legal services suppliers (eg, barristers, law firm agents and expert witnesses) engaged on behalf of, or for the purpose of providing advice or services to or for the benefit of third parties ('legal services suppliers'), and credit card spend.

<sup>3</sup> Our review of firm-issued credit card transactions excludes legal services suppliers.

## 1.4 Identifying modern slavery risks

As previously disclosed, we apply a risk-based methodology to assess and prioritise modern slavery risks in our operations and supply chain. Our approach is informed by reputable tools including the Global Slavery Index (*GSI*)<sup>4</sup> and the Global Estimates of Modern Slavery: Forced Labour and Child Labour (*GEMS*)<sup>5</sup>. We also monitor emerging risks on an ongoing basis through sources such as media monitoring, industry experts and NGO reports.

In assessing modern slavery risks, we consider the risk factors associated with geographic locations, industries, types of products and services, and business models. Our methodology for assessing geographic risk takes into account the location of direct suppliers and (where known) the location of product manufacture or service delivery.

To inform our evaluation of modern slavery risks, we also consider the concept of continuum of involvement as set out in the United Nations Guiding Principles on Business and Human Rights and the ways through which we have potential to cause, contribute to or be directly linked to modern slavery.

### (a) Operations

We have considered the potential for modern slavery, such as the use of forced labour, to exist in our operations, and we have again assessed the overall risk as low. As a supplier of legal services, we operate in a highly regulated sector and have a workforce composition that is considered to be at lower inherent risk of modern slavery practices. Although our total headcount increased slightly during the reporting period, over 95% of our people are located in Australia, which has been assessed by the GSI as having a lower prevalence of modern slavery practices. We take action to comply with all applicable employment legislation, and have written terms of employment for all employees. We also take action to comply with minimum wage requirements and conduct checks to confirm all employees are being paid above minimum wage, including those covered by the Legal Services Award 2020.

### (b) Supply chain

We review our risk-based analysis of procurement spend on an annual basis, taking into account potential modern slavery risk factors. For this reporting period, due to refurbishment of our Melbourne office, we also considered construction services and products as a category of procurement that has been identified as having higher inherent risk of potential modern slavery practices. The other categories listed below were previously disclosed in our FY23 Modern Slavery Statement.

- **Information and communications technology (ICT) equipment.** There are risks of potential modern slavery practices in connection with the extraction of raw materials, and the manufacture of ICT equipment in higher-risk geographies.

- **Promotional items and uniforms.** There are risks of potential modern slavery practices in connection with the sourcing of raw materials, and the production and manufacture of these products. Risk factors include low cost business models, workers at risk of exploitation and complex supply chains that extend into countries with higher risks of modern slavery practices.
- **Facilities management (eg, cleaning, security, waste management and recycling services).** Modern slavery risks may be elevated if vulnerable workers are present, and subcontracting practices are in use. Transparency may be more limited when these services are indirectly provided through third parties including building managers.
- **Hospitality, food and catering services.** There have been reports of worker exploitation in the food, agriculture and hospitality sectors in Australia<sup>6</sup>, and forced and child labour in connection with imported food products such as fish and cocoa<sup>7</sup>.
- **Outsourced business support, labour hire and recruitment services.** Potential risks may be heightened in this procurement category in circumstances where there is reduced visibility and control over recruitment practices, and workers' employment terms and conditions.
- **Construction services and products for office refurbishments.** There are risks of potential modern slavery practices in the raw construction materials supply chain, where risk factors such as a low-skilled workforce, complex supply chains and high-risk geographies are present.<sup>8</sup> The workforce for construction projects in Australia includes many foreign workers on temporary visas who are at risk of exploitation.<sup>9</sup>

Although the majority of our direct suppliers are located in Australia, we recognise that potential risks of modern slavery practices may be elevated for direct and indirect suppliers located in countries (including Vietnam and Papua New Guinea) that have been ranked by the GSI as having a higher prevalence of modern slavery. We also acknowledge that our direct suppliers may be part of complex supply chains and that potential risks may be heightened in lower tiers of our supply chains where we may have less visibility and leverage.

4 Walk Free Foundation (2023), The Global Slavery Index 2023, <https://www.walkfree.org/global-slavery-index/>

5 ILO, IOM & Walk Free Foundation (2022), Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, <https://www.walkfree.org/reports/global-estimates-of-modern-slavery-2022/>

6 Human Rights Law Centre et al (2022), Broken Promises: Two years of corporate reporting under Australia's Modern Slavery Act, <https://www.hrlc.org.au/reports-news-commentary/broken-promises>; RMIT Business and Human Rights Centre et al (July 2023), Where's the beef? An evaluation of meat company modern slavery statements over two years, <https://www.rmit.edu.au/news/bhrigh/wheres-the-beef>.

7 Walk Free Foundation (2023), The Global Slavery Index 2023, <https://www.walkfree.org/global-slavery-index/>

8 KPMG (2020), Property, construction & modern slavery: Practical responses for managing risk to people; US Department of Labor (2022), List of Goods Produced by Child Labor or Forced Labor, [https://www.dol.gov/sites/dolgov/files/ILAB/child\\_labor\\_reports/tda2021/2022-TVPR-List-of-Goods-v3.pdf](https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2021/2022-TVPR-List-of-Goods-v3.pdf)

9 Ibid.

### Case study: Melbourne office refurbishment

The firm is refurbishing its Melbourne office, and the design phase of the project was completed during the reporting period.

We recognise the higher inherent modern slavery risks in the construction industry, particularly in connection with the production and supply of construction materials and the use of sub-contractors. In recognition of this, the refurbishment project incorporated steps to assess and mitigate modern slavery risks.

- The designer, Hassell, was informed about the firm's responsible sourcing commitments and specifications, including in relation to assessing and addressing modern slavery risks. Hassell provided information on their modern slavery risk and reporting program and their commitment to addressing this issue within their projects.
- During the design phase, Hassell assessed the sustainability practices and performance of key materials, suppliers, and supply chains. The process involved independent research of third-party information sources to identify areas of higher risk in workplace fit-out materials, combined with targeted engagement with materials suppliers to request, receive, and vet detailed information and documentation on sustainability credentials. The assessment process applied a variety of environmental and social impact criteria including labour practices and modern slavery risk.
- The assessment outcomes were taken into account in setting the final specifications for the design, mitigating the risk of materials carrying higher modern slavery risk being used in the refurbishment.
- The tender for the construction phase of the project included responsible sourcing criteria and specifications in relation to modern slavery and labour contracting. Modern slavery compliance clauses (extending to sub-contractors) were included in the construction contract.

## 1.5 Assessing and addressing modern slavery risks

### (a) Policy framework

As previously disclosed, the firm has a policy framework to support our provision of a fair, safe and inclusive workplace, to guard against practices that may be present in situations of modern slavery, and to guide our approach to assessing and addressing modern slavery risks in our operations and supply chain.

We also have a responsible sourcing program designed to promote procurement practices that are ethical, and environmentally and socially responsible. During the reporting period we continued to strengthen our responsible sourcing policy and process by publishing additional materials to assist with procurement steps and practices. These materials include a template for assessing potential environmental and social impacts, including modern slavery risks, when sourcing products and services for the firm.

The following are the primary policies and procedures that support the firm's approach to assessing and addressing modern slavery risks in our operations and supply chain.

Policy/process	Purpose
Responsible sourcing policy and process	Sets out our processes for taking environmental and social considerations (including modern slavery risks) into account in our procurement decisions.
Supplier Code of Conduct	Applies to our suppliers and sets out the minimum standards we expect in relation to ethical business practices, human rights and labour practices, and environmental management.
Resolving issues policy	Sets out ways to raise a concern, and our commitment to resolving issues in a supportive and constructive way.
Whistleblowing policy	Sets out how to raise concerns about suspected serious misconduct without fear of reprisals or victimisation.

As detailed in our FY23 Modern Slavery Statement, we also have a number of additional policies that indirectly support our approach, including our Ethics code, Anti-corruption policy, Inclusion and diversity policy, Respect and fairness policy, Third party engagement policy and Workplace health and safety policy. During the reporting period, we updated our Ethics code to reference our commitment to respecting and supporting human rights, and to taking active measures to assess and address risks of modern slavery.

These policies cover obligations, commitments and expectations relating to workplace behaviours and practices, and procedures for entering into third party arrangements. All of the above policies and procedures apply to partners, employees and contractors in all of our offices, other than the Supplier Code of Conduct which applies to our suppliers. In FY24, we translated the Supplier Code of Conduct into the Vietnamese language, so that the code can be accessed in the local language by local suppliers to our Vietnam offices.



## (b) Due diligence

Our approach to supplier due diligence is risk-based. For direct suppliers identified as having potentially higher inherent risks of modern slavery, our due diligence processes may include desktop screening checks of publicly available information, database searches, ongoing media monitoring and seeking written confirmation that suppliers understand and are able to meet the standards in our Supplier Code of Conduct. During the reporting period, we reviewed our approach to media monitoring, including updating our search parameters and adding additional suppliers.

Our due diligence expands beyond tier one suppliers. During the reporting period, we continued to conduct due diligence enquiries in connection with indirect suppliers in procurement categories at higher inherent risk of modern slavery practices, including promotional items and cleaning services.

We continued working with technology provider Informed365 to support our supplier due diligence process. As a tenant and office-based business, we share overlapping procurement categories with the property sector, and participate in the Property Modern Slavery Supplier Platform hosted by Informed 365. The platform collects and collates information on suppliers, many of whom are suppliers to multiple organisations across the property industry. During the reporting period, we used the platform to connect with suppliers in our higher risk procurement categories. Representatives of the firm also participated in a workshop hosted by Informed 365 and Better Sydney which focussed on building supply chain visibility and engagement beyond tier one suppliers.

We also took the following actions in connection with procurement categories we have identified to be at higher potential risk of modern slavery practices:

- (i) in tender processes for stationery, catering and storage services, we incorporated responsible sourcing enquiries and specifications, including in relation to modern slavery risk and included the firm's Supplier Code of Conduct and modern slavery contract clauses in the terms of agreement;
- (ii) for temporary labour hire providers and suppliers of meat products, we refreshed screening checks and introduced additional risk mitigation steps for these procurement categories;
- (iii) we reviewed and streamlined the firm's approach to procuring promotional merchandise, and updated our responsible sourcing guide for clothing and promotional products; and
- (iv) we renewed our registration as a Fairtrade supporting workplace and continued to source Fairtrade certified tea, coffee, sugar and cocoa for use in our staff kitchens.

## (c) Training and awareness raising

We have continued to provide education sessions, a responsible sourcing and modern slavery e-learning module, and a dedicated responsible sourcing intranet site for employees to build knowledge and awareness of modern slavery risks, and capacity to apply the firm's responsible sourcing processes.

Our responsible sourcing and modern slavery e-learning module has been incorporated as a compulsory part of the standard induction program for people joining the firm. We also promoted the module through the firm's intranet. The module includes an explanation of modern slavery, details of the prevalence, risk factors and indicators of modern slavery, and the types of products and services at higher inherent risk of modern slavery practices.

During FY24, approximately 260 employees attended training or an awareness raising event relating to modern slavery.

Training and awareness raising initiatives during the reporting period included:

- (i) hosting a webinar for staff with a guest speaker from the Modern Slavery Response and Prevention team at the Australian Red Cross, who discussed labour exploitation and forced labour risks for migrant and refugee workers in Australia, and how to respond to concerns and disclosures of modern slavery;
- (ii) disseminating a modern slavery quiz for staff on World Day Against Child Labour, which was designed to test and build knowledge and awareness of modern slavery risks; and
- (iii) running a promotion for staff during Fairtrade Fortnight, to increase awareness of Fairtrade and to share information about responsible sourcing practices.

## (d) Collaboration and external engagement

We recognise the importance of external engagement and participating in multi-stakeholder initiatives to share knowledge and refine best practice.

During the reporting period, members of the firm's Responsible Sourcing team and Business & Human Rights legal practice participated in the United Nations Global Compact Dialogue on Business & Human Rights. We also continued to be an active member of the United Nations Global Compact Network Australia (**UNGCA**) Modern Slavery Community of Practice for business members.

Through the firm's membership of the Australian Legal Sector Alliance (**AusLSA**), we continued to participate in the AusLSA Modern Slavery Co-Lab program, designed to support an effective modern slavery response in the Australian legal sector through collaboration, knowledge sharing and capacity building.

Members of the firm's Business & Human Rights legal practice gave assistance to the NSW Anti-Slavery Commissioner regarding model contract clauses on modern slavery. In January 2024, the Commissioner published its *Guidance on Reasonable Steps (GRS) to Manage Modern Slavery Risks in Operations and Supply Chains*, including the GRS Model Contract Clauses.

Our Business & Human Rights practice also continued to provide advice and training to a range of businesses, government clients and not-for-profit organisations in relation to their modern slavery programs, including their approaches to human rights due diligence in the context of modern slavery risks, and their reporting obligations under the Modern Slavery Act.

### (e) Remediation and mechanisms for raising concerns

We continued to provide a number of internal and external mechanisms for employees and contractors to raise concerns about unacceptable behaviour, including in relation to potential modern slavery risks. Mechanisms include an anonymous complaints portal and support options such as access to confidential counselling.

In the reporting period we:

- (i) continued to promote our anonymous complaints portal to new employees through induction and through articles on the firm's intranet and reminded people of options available to raise concerns;
- (ii) continued to develop mechanisms for receiving and listening to employee feedback;
- (iii) asked our people in our FY24 employee survey about their trust in mechanisms for raising concerns, to ensure we are aware of the level of trust and any areas for improvement; and
- (iv) embedded a trauma informed and human-centred approach when managing complaints, including through implementing agreed processes and training for staff who manage complaints.

As previously disclosed, our Supplier Code of Conduct requires suppliers to provide their workers with a mechanism to confidentially report grievances without fear of penalty, reprisal or harassment. The Code also includes a requirement for whistleblower protection and for reporting mechanisms to be accessible and well-publicised.

We continued to make Australian Red Cross 'Modern Slavery happens in Australia' flyers available in our service centre reception areas, with information about modern slavery, who to contact for advice and support and a link to the Australian Red Cross' Work Right Hub.

## 1.6 Evaluating effectiveness of our actions

To evaluate the effectiveness of our actions to assess and address modern slavery risks, we continue to monitor quantitative measures including supplier due diligence assessment and modern slavery training completion rates. Through the firm's third party contract review process, we record the inclusion of modern slavery-related clauses and the firm's Supplier Code of Conduct in new and renewed supplier terms of agreement. During the reporting period, we improved our tracking of modern slavery-related clauses in supplier terms of agreement, and recorded an increase in the inclusion of modern-slavery related clauses in such agreements. We aim to continue to increase the number of our suppliers who are required to comply with modern slavery laws and our Supplier Code of Conduct in their agreements, with a focus on hospitality and small business suppliers.

We also regularly monitor the frequency and trends of all concerns raised (including any modern slavery concerns if they were to be raised) through our anonymous complaints portal and other avenues for complaints (eg, managers, partners or the People & Development team).

We reviewed the results of the modern slavery quiz disseminated for World Day Against Child Labour as one

mechanism for assessing the existing knowledge of our staff on modern slavery issues, including identifying knowledge gaps.

The firm's Modern Slavery and Responsible Sourcing working group, comprising senior representatives from the firm's Business Operations, Office of General Counsel, Finance, Information Technology, Marketing & Client Services and People & Development teams has continued to meet with the objective of supporting operational implementation, monitoring progress and reviewing effectiveness of the firm's actions to assess and address modern slavery risks in our operations and supply chain.

During the reporting period, no instances of modern slavery were identified or reported through the firm's due diligence processes or grievance mechanisms.

## 1.7 Future action and progress

We aim to continually strengthen and improve our approach to assessing and addressing modern slavery risks in our operations and supply chain. In the table below, we outline progress on the areas of focus identified in our FY23 Modern Slavery Statement, and identify new areas of focus for future action.

### Risk assessment and due diligence

#### Progress

- Incorporated modern slavery risk assessment and mitigation steps into the design phase of the project to refurbish our Melbourne office.
- Expanded our use of the supplier due diligence platform hosted by Informed365.
- Updated our media monitoring, which we use as a tool to conduct ongoing due diligence on our suppliers.
- Updated our Ethics Code to reference our commitment to taking active measures to assess and address risks of modern slavery.

#### Areas of future focus

- Continue to review our risk assessment approach from time to time to address any new and emerging modern slavery risks and priorities, and monitor changes to our procurement spend and supplier base.
- Continue to review the firm's policy documents to reflect our commitment to assessing and addressing risks of modern slavery practices.
- Embed the Supplier Code of Conduct in our new supplier onboarding process.
- Continue to monitor potential inherent risks of modern slavery arising from the construction phase of the project to refurbish our Melbourne office.

### Training and awareness raising

#### Progress

- Commenced the development of tiered responsible sourcing e-learning modules.

#### Areas of future focus

- Roll out tiered responsible sourcing training to support people with different levels of procurement responsibilities.
- Launch a new online training module focussed on our culture of respect, which will also encourage people to raise any concerns they have through the avenues available.

## Collaboration and external engagement

### Progress

- Contributed to model contract clauses on modern slavery, published as part of guidance by NSW Anti-Slavery Commissioner.
- Continued to participate in the UNGCNA Modern Slavery Community of Practice and the AusLSA Modern Slavery Co-Lab program for legal sector members.

### Areas of future focus

- Continue to participate in multi-stakeholder initiatives and support sector-led opportunities for collaboration and knowledge-sharing.

## Measures of effectiveness

### Progress

- In our FY24 employee survey, asked staff about their trust in mechanisms for raising concerns.

### Areas of future focus

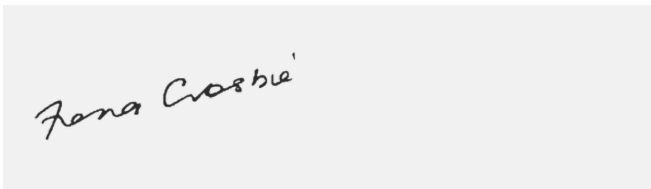
- Continue to develop and enhance measures of effectiveness, including in relation to training feedback and learning outcomes.

## 1.8 Additional information

Through our pro bono legal practice, we provide free representation to individuals at risk of exploitation and to organisations working to protect them, including International Social Service Australia, which supports families and children separated by international borders and the International Centre for Missing & Exploited Children Australia.

A focus area of our pro bono practice is support for asylum seekers, a vulnerable population at risk of exploitation. During the reporting period, we worked closely with four specialist migration legal services to assist clients to apply for asylum in Australia. Our partners and legal staff also represented several asylum seekers who were unsuccessful in their protection visa applications, including in appeals and judicial review applications.

### Signed By:



**Fiona Crosbie**  
Chair  
Allens

### Sydney

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We also provide free legal assistance to build capacity in organisations that provide food aid to counter food insecurity and by so doing, help prevent vulnerability to exploitation. In Australia, we work with OzHarvest and in Vietnam, with VietHarvest.

Allens has a full service ESG legal practice and our legal specialists produce publications, deliver presentations and advise clients in relation to the management of human rights risks in their operations and supply chains (including in connection with modern slavery).

## 1.9 Governance and consultation process

The Boards of Allens and Allens Operations are responsible for the oversight and approval of the firm's modern slavery statement. Day-to-day operation of the firm's responsible sourcing program, including our modern slavery response, is managed by the firm's Community Engagement Team and is overseen by the firm's Community Engagement Board (chaired by the firm's Managing Partner). The firm's Modern Slavery and Responsible Sourcing working group supports operational implementation, monitors progress and reviews effectiveness of the firm's responsible sourcing processes.

The firm has shared business functions and policies (including in relation to the management of modern slavery risks). A wide range of stakeholders from across the firm were consulted in connection with the preparation of this statement, including from the Office of General Counsel, Finance, People & Development, Business Operations, Information Technology, Marketing & Client Services, Innovation & Digital Solutions and Patent and Trade Mark Attorneys teams, and relevant staff for the Vietnam, Singapore and Papua New Guinea offices.

Members of the Board of each reporting entity were given an opportunity to consider and provide comments on the statement prior to approval and publication.

The Allens Board approved this statement on 20 November 2024 and the Board of Directors of Allens Operations Pty Limited approved this statement on 4 December 2024.



**Matt Graham**  
Director  
Allens Operations Pty Limited

## Index:

<i>Mandatory criteria for modern slavery statements Modern Slavery Act 2018 (Cth) s 16.</i>	Location of information
Identify the reporting entity.	Introduction
Describe the structure, operations and supply chains of the reporting entity.	1.2 Our structure and operations 1.3 Our supply chain
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.	1.4 Identifying modern slavery risks
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.	1.4 Identifying modern slavery risks 1.5 Assessing and addressing modern slavery risks
Describe how the reporting entity assesses the effectiveness of these actions.	1.6 Evaluating effectiveness of our actions
Describe the process of consultation with any entities that the reporting entity owns or controls.	1.9 Governance and consultation process
Provide any other relevant information.	1.1 Our commitment 1.7 Future action and progress 1.8 Additional information