

2023

MODERN SLAVERY
STATEMENT



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Image: ANZ Centre, Melbourne.

Acknowledgement of Country and Traditional Owners

ANZ acknowledges the Traditional Custodians of Country throughout Australia and recognises the continuing connection to lands, skies and waterways. We pay our respects to Aboriginal and Torres Strait Islander cultures, and to Elders past and present.

Whakatauākī, ANZ New Zealand's Proverb

Tākiri-ā-Rangi The expansive universe above

Tākiri-ā-Nuku The beauty of the proceeding lands below

Tākiri Te Awatea A new dawn beckons

Kia Puawai Ki Te Ao A blossoming to the world

Te Kare A Roto E With ripples of compassion and hope for all.

ABOUT THIS REPORT

On 3 January 2023, Australia and New Zealand Banking Group Limited (ANZBGL) established by a scheme of arrangement, a non-operating holding company, ANZ Group Holdings Limited (ANZGHL), as the new listed parent holding company of the ANZ Group and implemented a restructure to separate ANZ's banking and certain non-banking businesses into the ANZ Bank Group and ANZ Non-Bank Group (Restructure).

The ANZ Bank Group comprises the majority of the businesses and subsidiaries that were held in ANZBGL prior to the Restructure. The ANZ Non-Bank Group comprises banking-adjacent businesses developed or acquired by the ANZ Group to focus on bringing new technology and banking adjacent services to the ANZ Group's customers, and a separate service company.

This document is ANZGHL's and its subsidiaries' response to the requirements of both the Australian Commonwealth's *Modern Slavery Act 2018* (Cth) (Australian Act) and the United Kingdom's *Modern Slavery Act 2015* (UK Act). This document is referred to throughout as our "Statement". This is our eighth UK Statement and fourth Australian Statement.

In this Statement the use of the words "ANZ", "the Group", "ANZ Group", "we", "us" or "our" refers to ANZGHL and its subsidiaries, including any entities that the reporting entities control and entities in which the reporting entities have an ownership interest exceeding 50%, unless otherwise stated.

The risks and actions described in this Statement are those which relate to the business of the ANZ Group, including the reporting entities in the ANZ Group, any controlled entities in the

ANZ Group and entities in which the ANZ Group has an ownership interest exceeding 50%.

This Statement covers the actions we have taken to identify, assess and manage modern slavery risks in our operations and supply chain during the financial year commencing on 1 October 2022 and ending 30 September 2023, referred to as "2023" throughout the Statement. Monetary amounts in this Statement are reported in Australian dollars, unless otherwise stated.

Appendix 1 outlines the reporting criteria under the Australian and UK Acts respectively and identifies where each criteria is addressed in this Statement.

This Statement covers the operations and supply chain of the ANZ Group and the reporting entities for the purposes of the Australian and UK Acts listed in the table below.

Australian Act	UK Act	Entity Name	Australian Business Number (ABN)
✓	✓	ANZ Group Holdings Limited	16 659 510 791
✓	✓	ANZ BH Pty Ltd	45 658 939 952
✓	✓	Australia and New Zealand Banking Group Limited	11 005 357 522
✓		ANZ Lenders Mortgage Insurance Pty. Limited	77 008 680 055
✓		ANZ Rewards No. 2 Pty Ltd	41 082 713 915
✓		The trustee for Kingfisher Trust 2008-1	83 026 578 533
✓		Votrait No.1103 Pty Limited	98 082 564 369
✓		ANZ Funds Pty Ltd	61 004 594 343

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SUMMARY OF KEY 2023 ACTIONS

To manage our modern slavery risks, our modern slavery program focuses on building awareness, improving policies and processes, and undertaking due diligence across our business operations and supply chain.

This section summarises the key actions undertaken in 2023, which are discussed in more detail in the workstream sections of this Statement.

- We continue to promote awareness of modern slavery risks across our operations and supply chain and encourage our staff to undertake and complete learning programs. In 2023, we:
 - Included information on how to identify and respond to modern slavery risks and red flags in our 'iCare' values update for approximately 3,500 frontline retail bankers.
 - Provided training to groups of employees who are more likely to encounter modern slavery risks, such as our sourcing specialists, Institutional Relationship Managers, Extra Care Hub team² and the responsible investment teams.
 - Improved our credit risk assessment process via our Online Customer Profile platform by integrating our Social and Environmental Risk screening tool for large business customers. This allows us to improve our identification of financial and non-financial risks (including reputational risk) we may face through our customer activities, both at an individual customer level and across our portfolio. This provides us with a richer data set by which we can seek to identify possible trends and opportunities to improve our policy, screening and customer engagement on non-financial risks including modern slavery.
- We participated in cross-industry collaboration on modern slavery issues and have contributed to industry roundtable discussions and conferences.
- Our ANZ New Zealand Investments Limited team commenced development of a process which, when implemented, is expected to require domestic and third-party external managers to confirm modern slavery is taken into account in their investment process.
- Implemented additional name screening for selected entities in higher risk regions.
- Continued to update anti-child sexual exploitation algorithms for both Australia and New Zealand to incorporate indicators from recent Fintel Alliance typology reporting³.

¹. Integrity, Collaboration, Accountability, Respect, Excellence. See further details at page 9. ². Refer to page 37 of the [ESG Supplement](#) for more information on the Extra Care Hub. ³. See page 10 for more details.

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OUR BUSINESS STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Our structure and entities

ANZ takes a Group-wide approach to managing modern slavery risks in its operations and supply chain. There are several reporting entities in the ANZ Group (detailed on page 3). This is a joint Statement made by ANZ on behalf of itself and those reporting entities.

Each reporting entity is part of the ANZ Group. The senior leaders of each entity, who are ANZ Group employees, apply the ANZ policies and practices in managing the modern slavery risks faced by their business. Each reporting entity considers any potential issues that are unique to their business and, where required, seek input from members of the modern slavery working group. We engage with each reporting entity in the preparation of this Statement and provide them with relevant information including this Statement to communicate to their governing Boards.

Where we own or control an entity that uses part – but not all – of our ANZ policies and processes, we engage with them on risk identification and supply chain screening. As required, we also support other entities we have a relationship with, but that are not owned or controlled by ANZ, including the ANZ Staff Superannuation Scheme Fund¹.

In undertaking the above steps, ANZ and the reporting entities covered in this Statement consider that there has been appropriate consultation in preparing the Statement.

Our operations

ANZ operates in 29 markets² and employs 41,849 people³ across the jurisdictions we operate in. We provide banking and financial products and services to approximately 8.5 million retail and business customers.

Our divisions

Australia Retail – serves retail customers across Australia through our branch network, ATMs, digital and mobile banking applications including ANZ Plus.

Australia Commercial – serves commercial and private banking customers across Australia through our business centres, digital and mobile banking applications.

Institutional – serves Institutional and large Corporate customers across Transaction Banking, Corporate Finance, and Markets. Institutional customers may be based in, and operate in, many different countries.

New Zealand – serves retail and commercial banking customers in New Zealand and is one of the largest New Zealand companies based on profit and assets.

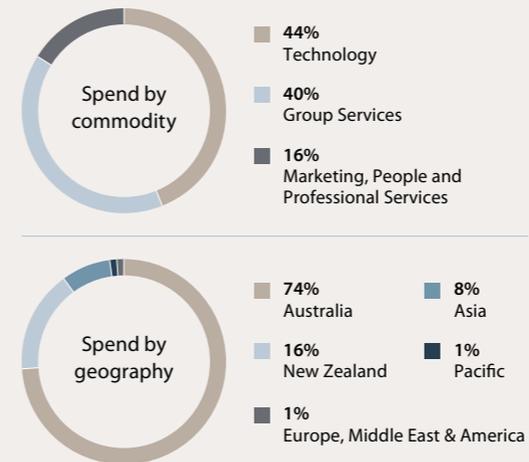
Pacific – provides products and services to retail and commercial customers located in the Pacific Islands.

Group Centre – provides support to the operating divisions including Technology, Property, Risk Management, Financial Management, Treasury, Strategy, Marketing, Talent and Culture, Corporate Affairs, and Investor Relations.

Our supply chain

In 2023, we spent approximately \$4.9 billion on procuring goods and services from nearly 5,500 suppliers across all reporting entities and divisions.

The majority of our expenditure (90%) is located in Australia and New Zealand. Key areas of spend include technology, group services (including property, travel and banking services) and marketing, people and professional services.



Refer to the supply chain section on page 7 for further detail on the types of products procured and actions we take to assess and manage modern slavery risks.



Image: ANZ Centre, Melbourne.

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¹. ANZ owns the trustee company that manages the ANZ Staff Superannuation Scheme Fund (Scheme). The Scheme itself is not owned by ANZ. We engage with ANZ employees who administer the Scheme, sharing information and resources to support their approach to addressing modern slavery risk. ². Our markets of operation <https://anz.com/shareholder/centre/about/ANZ-about-us/>. ³. Headcount as at 30 September 2023. This figure includes permanent and fixed-term employees.

IDENTIFYING, ASSESSING AND MANAGING RISKS

Identifying risks

We seek to identify our salient human rights risks according to where we could potentially cause or contribute to the most significant negative human rights impacts – including modern slavery.

The United Nations Guiding Principles (UNGPs¹) outline the responsibility for business enterprises to respect human rights. Our approach to identifying risk is guided by the UNGPs categories of “causing”, “contributing to”, or being “directly linked to” adverse human rights impacts.

Assessing risks

We periodically conduct a risk assessment to understand and identify where our potential to cause, contribute to, or be directly linked to modern slavery is most likely to arise across our operations and supply chain.

This assessment considers internal data and insights from across our business and research reports from organisations with expertise in modern slavery². Factors we consider in our risk assessment include:

- Certain high-risk sectors e.g. agriculture, manufacturing, domestic work.
- Certain countries with higher estimated prevalence of modern slavery.
- Unskilled or low skilled work e.g. labouring, cleaning.
- Labour force used e.g. seasonal, temporary workers.
- ‘At-risk’ groups e.g. migrant workers, children, and women.

Our Modern Slavery Working Group uses this risk assessment to help inform where we should focus our controls.

Our Working Group is composed of employees across multiple functions including Group ESG, Risk and Compliance, Legal, Group Procurement, Financial Crime, Investments and our Retail, Commercial and Institutional businesses. The Working Group consults across our business to seek to improve ANZ’s Group-wide practices in managing modern slavery risk.

Members of the Working Group contribute to workstreams that focus on different components of our businesses. These workstreams include:

- **Supply chain:** managing the procurement of goods and services we source to run our business.
- **Customers:** to whom we provide a wide range of banking and financial services, with sub-streams for the activities of our Retail, Commercial and Institutional divisions.
- **Investments:** of customers’ funds, including New Zealand Investments and Private Bank in Australia.

Additionally, through the application of our policies and processes, our Talent and Culture team assess modern slavery risks related to our people – including staff directly employed by ANZ and our contractors.

These workstreams are discussed further to the right. As a Group, ANZ also considers that our existing policies and processes help to mitigate risk and improve our ability to seek to influence changes in practice and behaviours at a stakeholder level. For more information refer to page 17.

Modern slavery risk, at a Group level, is assessed for the following workstreams and for our people as follows:

- **Supply chain** – higher risk due to volume and breadth of goods and services procured, and our international banking presence in a number of higher risk countries. For further information refer to pages 7-8;
- **Customers** – higher risk due to both the sectors and countries in which we, and our customers, operate. For further information refer to pages 9-10;
- **Investments** – moderate to lower risk for investments made by our third-party fund managers and New Zealand fund managers³ due to risk-based drivers including our overall investment philosophy and selection of fund managers. For further information refer to pages 12-13;
- **People** – lower risk due to skills required, visibility of employment arrangements, and location of most of our employees⁴. For further information refer to page 14.

This assessment enables us to prioritise programs of work that we consider are likely to have the most effective impact, as a Group, to respond to modern slavery risk.

Managing risks

To identify, measure, evaluate, monitor and report on risks, our Working Group focuses on three priority areas:

- 1 Building awareness of modern slavery through training and education.
- 2 Policy and process improvements.
- 3 Enhancing due diligence.

We build on the efforts undertaken in previous years and seek to continually improve our ability to be effective in our modern slavery program.

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1. <https://www.business-humanrights.org/en/big-issues/un-guiding-principles-on-business-human-rights/>. 2. UN Global Compact Network Australia, The Global Slavery Index, Rep Risk Database, The Walk Free Foundation, Fair Supply, Clean Energy Council, The Mekong Club, Fintel Alliance, International Labour Organisation, Transparency International, Monash University, The University of Sydney, Pillar Two. 3. External fund managers are used for private bank customers in Australia. ANZ New Zealand Investments Limited (a subsidiary of our New Zealand business) uses external and internal fund managers. 4. Australia and New Zealand have lower prevalence and vulnerability to modern slavery according to the Global Slavery Index (2023).

SUPPLY CHAIN

Identifying our supply chain risk

Our Procurement team applies a risk matrix to identify where modern slavery risks are most likely to arise in our supply chain.

The matrix considers procurement categories, spend, likelihood of forced labour¹, geography, and the potential impact to people. To a certain extent, the matrix also considers the extended supply chain – for example, where ANZ recognises that although our suppliers may be based in countries with a lower risk of forced labour, they may make use of manufacturing facilities in countries where the potential risk is higher.

We are guided by the UNGPs to understand where we could cause, contribute to, or be directly linked to modern slavery. The result is a risk assessment that identifies low, medium and high-risk categories.

In applying the matrix, we have identified the following categories as high risk:

DEVICES



PROMOTIONAL ITEMS



CORPORATE WARDROBE



STATIONERY



CONSTRUCTION



FACILITIES MANAGEMENT (E.G. CLEANING AND SECURITY)



FURNITURE AND FITTINGS



FLEET (E.G. CARS PROVIDED TO OUR FRONTLINE STAFF)



SOLAR PANELS



DRIVERS OF SPECIFICALLY CHARTERED BUSES TRANSPORTING ANZ STAFF TO WORK



These 10 categories accounted for approximately 10% of our overall procurement spend in 2023.

Building awareness

Our sourcing managers in Group Procurement undertake specialised training on modern slavery risks in the supply chain which covers:

- what modern slavery is;
- potential impacts on individuals, companies and society;
- modern slavery legislation and our response; and
- supply chain impacts and how we can minimise the potential risks.

The training was updated in 2023 to include the latest information on the extent of modern slavery and forced labour globally. This training was delivered to more than 80 staff in sourcing and other supplier facing roles during 2023.

Supplier policies and processes

Our Supplier Code of Practice (SCOP²) outlines our minimum requirements for suppliers subject to the SCOP in relation to human rights and workplace relations, occupational health and safety, ethical business practices, information management and confidentiality, accessibility, environmental management and supplier diversity.

It is informed by the OECD Guidelines for Multinational Enterprises and the UN Global Compact and aligns with our Code of Conduct. For more information about our SCOP visit anz.com.au/about-us/esg/policies-practices/sustainable-procurement/.

Since 2021, our usual practice is to include separate contractual clauses covering human rights and modern slavery in ANZ standard contract templates. Where we are using the supplier's standard contract, we outline:

- a requirement to comply with relevant modern slavery laws, including legislation prohibiting modern slavery practices; and
- a specific modern slavery clause requesting suppliers take reasonable steps to address modern slavery in their business and supply chain.

Our Purchasing Policy outlines risk management guidelines, and commercial and operational considerations in managing suppliers.

This year we have included a Modern Slavery Supplier Toolkit in our Procurement Category Management Playbook. The Playbook sets out the mandatory and optional steps for employees where a primary requirement of their role is to procure goods or services on behalf of ANZ. This includes steps to minimise the risks of modern slavery and to understand what to do if an instance of modern slavery is suspected.

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1. Likelihood assessment informed by: Global Estimates of Modern Slavery: Forced Labour and Forced Marriage (2022). 2. Available in six languages.

Supplier due diligence

We expect suppliers to share our commitment to business integrity and ethics, including by adopting safeguards that mitigate human rights risks.

Contracted suppliers, including subcontracted suppliers, are screened as part of Group Procurement’s ongoing supplier due diligence using a third-party tool to assess performance against 28 ESG issues across the topics of environmental footprint, community relations, employee relations and corporate governance, including human rights. In the first instance, this process involves a database search to identify whether any allegations have been made or reported in relation to each supplier. If any matters which ANZ considers significant are identified, we will typically engage with the supplier to seek a response and then consider whether we are comfortable the supplier is managing the issue in line with our expectations as detailed in our SCOP.

In 2023, we also undertook nearly 5,300 checks which included our top 100 suppliers, by spend. These checks identified potential issues in 12 instances. We requested further detail from the suppliers to determine whether they had adequate measures in place to resolve the identified issue/s. We worked with these suppliers to understand the issue/s and the steps the supplier was taking to address the issue.

We continue to monitor and engage with our suppliers on issues we identify as part of this due diligence to help identify and respond to modern slavery.

Our procurement tender process requires potential suppliers to confirm that they do not use forced labour themselves or tolerate it in their supply chains. Suppliers are required to explain how they minimise the risk of forced labour in their business and operations. There are additional questions for tenders where there is a potential higher likelihood of forced labour.

Our Operational Contract Management Framework (OCMF) describes our approach to managing supplier relationships where the contracted services are deemed to be of critical importance and/or high risk to ANZ, or by nature of the goods and services, require an active management plan. While not a contractual requirement, we seek an annual attestation of adherence to the SCOP from major suppliers managed under our OCMF.

We engage with all major suppliers to understand their position on attestation and to highlight the purpose of our SCOP. In 2023, 79% of our major suppliers provided an attestation of adherence to our SCOP. Our attestation process is targeted, focusing on human rights, governance, ethical business practices and environmental management. We also seek attestations from a sample of suppliers each year in countries such as India, China, the Philippines, Vietnam, Papua New Guinea and Pacific nations. We continue to encourage suppliers to attest to the SCOP.

If a supplier’s performance is assessed to be below acceptable standards, our preference is to identify best practice and engage with the supplier to seek information on how they intend to respond to the issue/s, rather than to terminate the relationship immediately. This is consistent with the guidance issued by the Office of the United Nations High Commissioner for Human Rights on what is expected from businesses under the UNGPs¹.

Additional Third Party Due Diligence

In 2023, ANZ completed uplift of a Business Integrity Third Party Due Diligence (TPDD) program to better enable identification of bribery, corruption and human rights issues associated with suppliers and vendors engaged by ANZ. Compared to our last reporting period, ANZ has improved visibility of our supply base with:

2,548 third party engagements subject to risk-based due diligence in 2023.

The TPDD program sets the minimum standard all suppliers to ANZ are expected to be assessed against. ANZ Risk teams work with country offices and local business units to address any concerns that may arise.

This year we worked with a third-party software solution, FRDM, to understand the risks in our sub-tier suppliers for a sample of our primary suppliers. This was conducted via the use of FRDM’s Trading Partners’ module which maps sub-tier suppliers to primary suppliers.

Key actions from our 2023 program of work (supply chain) included:

Building awareness	<ul style="list-style-type: none"> Updated our specialist modern slavery training with the latest detail on the extent of modern slavery and forced labour Delivered specialist training to over 80 Group Procurement staff members
Policy and process	<ul style="list-style-type: none"> Continued our contract uplift program for legacy contracts to include SCOP and modern slavery clauses Inclusion of the Modern Slavery Supplier Toolkit in the Procurement Category Management Playbook On-going uplift of TPDD program to improve visibility of supplier based and evidence risk based due diligence activities
Due diligence	<ul style="list-style-type: none"> Utilised a third party software solution to better understand the risks in our sub-tier suppliers for a sample of our primary suppliers Working with a higher risk supplier to understand their approach to modern slavery including quarterly factory audit tracking on factories manufacturing goods for ANZ

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1. <https://www.business-humanrights.org/en/big-issues/un-guiding-principles-on-business-human-rights/>.

CUSTOMER RELATIONSHIPS

We provide banking and financial products and services to approximately 8.5 million retail and business customers and operate across 29 markets.

We manage customers in three broad segments and structure our customer relationships to reflect these:

- The **Retail** segment in Australia and New Zealand includes ANZ's retail customers and is focused on improving customers' financial wellbeing.
- The **Commercial** segment services ANZ's commercial customers across Australia and New Zealand and is focused on helping businesses to start, run and grow. Private Bank customers in Australia are also included in this segment.
- The **Institutional** segment includes global Institutional and large Corporate customers in Australia, New Zealand and in the international markets. Institutional operates across three product sets: Transaction Banking, Corporate Finance, and Markets.

Our modern slavery risks include the potential impact on people and communities from the actions or omissions of our customers to which we provide banking products and services. We strive to build awareness of modern slavery risks through our customer relationships and manage these risks through policies and procedures, enhanced human rights due diligence and transaction monitoring.

We engage with our customers where appropriate to advise that we expect them to identify, manage, monitor and act on adverse impacts on human rights, including modern slavery. Customer engagement is elevated with Institutional and Corporate customers.

Identifying our customer risks

We use the following risk-based approach to identify where our customer risks are:

- A 'top-down' consideration of risk factors to help identify where the potential for modern slavery is higher, to target our efforts.
- A 'bottom-up' approach through our policies, processes, screening tools, financial crime threat management processes, annual reviews and customer engagement opportunities. These are risk-based in their application and help us understand how customers are responding to allegations or potential instances of modern slavery.
- An 'issues-based' approach where we review reputable external sources to identify modern slavery risks in sectors and/or risks associated with specific customers, and then seek to engage certain customers on identified issues, as we consider appropriate.

We have established measures to identify where our customer risks are likely to be higher. Examples of where higher risk modern slavery practices may arise in our customer relationships include:

- Institutional customers operating across Asia in high-risk sectors such as manufacturing, agriculture and construction.

- Small and medium-sized businesses in our home markets of Australia and New Zealand, including the agriculture sector.
- Retail and Commercial customers potentially exposing ANZ to alleged criminal activity through money laundering, terrorism financing and modern slavery.

This year we continued to use data to target our review into higher risk areas. We focused on our Institutional and Commercial businesses and included reference to modern slavery in our Retail Customer Vulnerability Framework¹.

Building awareness

Building on the engagement of our staff and customers in previous years, in 2023 we sought opportunities to raise awareness of modern slavery throughout our business including:

- Training on family violence and modern slavery in our regular iCare conversations, which focus on looking after our staff, customers and community, and aim to create a collaborative culture. iCare conversations are held weekly as part of the branch operating rhythm by approximately 3,500 frontline retail bankers in Australia. This training covered:
 - what modern slavery is;
 - links between family violence and modern slavery;
 - 'red flags' that might alert staff to take extra care;
 - how to escalate concerns; and
 - how to seek additional help or support.

- New employees with the authority to approve lending and customer on-boarding in our Institutional division must undertake our online Social and Environmental Risk training course. 15 new employees completed the course in 2023.
- All ANZ employees must complete annual mandatory training on 'Financial Crime Essentials' which explains how ANZ can help 'break the link' between criminal organisations and behaviour, and the impacts on its victims. It supports our people to understand the importance of:
 - knowing our customers and third parties, e.g. suppliers;
 - considering who the customers and third parties are, and where and why they do business; and
 - recognising the tactics used by some parties to evade sanctions, such as using forced labour.

The training includes a case study discussing modern slavery through forced labour in the supply chain of a company.

- **ANZ's Ethical Decision-Making Framework** online training modules are available to all employees and one of the modules includes a modern slavery case study.
- **Modern Slavery – the basics online training module** contains information on modern slavery red flags, ANZ's risks and response, how to talk to others about modern slavery, and ways concerns can be escalated. 185 modules were completed by employees during the year.²
- All employees have access to **ANZ's modern slavery page** on the intranet. It contains modern slavery research, links to external and internal learning materials, and explains how to escalate modern slavery concerns.

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¹ For more information about supporting customers in need of extra care visit <https://www.anz.com.au/promo/self-help/>. ² While the training modules are available to all ANZ staff, they are most applicable to the relatively small number of our people whose role is more directly exposed to potential human rights risks, including modern slavery. Those individuals are involved in procurement, investment management and the relationship management of Institutional customers as detailed in "Identifying, assessing and managing risks" from page 6.

How we conduct due diligence for Institutional and Corporate customers

Prior to entering into a relationship with a large business customer or entering into any new material transaction, our bankers are expected to consider the customer's management of its material social and environmental issues and associated potential impacts. Bankers are also expected to consider the customer's history of, and approach to dealing with, potential (or historical) social and environmental impacts.

Under our credit policy we review our large business customers at least annually. This includes the consideration of issues specified in our Social and Environmental Risk Policy and, where relevant, 'sensitive sector' requirements.

We seek to undertake enhanced human rights due diligence for large business customers operating in higher-risk geographies and sectors, to better understand our customers' approach to human rights (including modern slavery), assess the risk implications, and to determine whether impacts can be avoided or mitigated.

We monitor certain reports of social, environmental and significant governance incidents and allegations (including modern slavery) against existing and prospective ANZ customers through reports from our Reputation Risk Radar service. We also obtain information through regular dialogue between relationship managers and their customers which may alert us to issues. Notable incidents and allegations are referred, where appropriate, to our risk management forums in which social, environmental and credit risks are considered.

We expect customers to manage and engage their stakeholders by implementing appropriate strategies, plans and grievance mechanisms. The Equator Principles is a risk management framework for determining, assessing and managing social and environmental risks in large infrastructure and industrial projects. As a member of the Equator Principles Association since 2006, we endeavour to finance and advise on projects that are developed in a manner that is socially responsible and reflect sound environmental management practices.

We use the Equator Principles¹ as a minimum standard for assessing certain environmental and social risks, undertaking the due diligence and monitoring to support responsible decision making. We collectively refer to these types of finance as "Project Finance". We encourage projects to establish appropriate operational-level grievance mechanisms for affected communities and workers in accordance with the Equator Principles.

Our Ethics and Responsible Business Committee (ERBC) considers, where appropriate, the social and environmental impacts of the industries, customers and communities ANZ serves, including from projects. The ERBC is responsible for overseeing the ERBC Sub-Committee for sensitive wholesale transactions. The rationale for each decision relating to any escalated transactions is provided to the ERBC for oversight and information.

How we conduct due diligence for Retail and Commercial customers

We apply mandatory standards to Retail and Commercial customer due diligence. Our Know Your Customer (KYC) due diligence helps us to confirm and verify customers. Verification of identity is undertaken using independent and reliable documents or electronic data. This process helps us to confirm the customer's identity, assess risks, prevent fraud, theft and other crimes, and better service our customers.

Customers that pose a high money laundering and terrorist financing risk can also present modern slavery risks. These customers are subject to enhanced due diligence measures and monitoring, senior management review and compliance approval. Our due diligence systems are aimed at detection and, by extension, prevention of criminal conduct.

We seek to conduct detailed customer conversations² with certain customers to better understand their businesses and financial situation in Retail and Small Business Banking. These conversations cover customer needs, financial situation, goals, and the banking solutions that best suit them. By developing a deeper understanding of our customers, we are better placed to identify 'red flags' for modern slavery. For our largest Commercial customers, we conduct annual reviews to better understand their business, its risks and associated risk mitigation strategies.

Due diligence in transaction monitoring

In accordance with our Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) obligations, we perform risk-based due diligence on customers and their activities in proportion to the money laundering and terrorism financing risk posed by that customer. We seek to identify unusual or suspicious transactions, activities and/or behaviours through a combination of transaction monitoring and other methods of observation, and report suspicious activity to the appropriate authorities.

We use specific indicators and typologies to help us identify possible instances of child exploitation, sexual servitude and labour hire abuse (all forms of modern slavery). Where we form a suspicion, a report is lodged with the appropriate regulator, including the Australian Transaction Reports and Analysis Centre (AUSTRAC) in Australia.

Financial intelligence is vital in the detection and disruption of organised criminal activity. Therefore, we work closely with regulators, government departments and law enforcement agencies to fight financial crimes through sharing relevant information via the Fintel Alliance³ and other private and/or public partnerships.

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1. Source: Equator Principles https://equator-principles.com/app/uploads/The-Equator-Principles_EP4_July2020.pdf. 2. 'A to Z' reviews. 3. Fintel Alliance is an AUSTRAC initiative established in 2017 to increase the resilience of the financial sector to criminal exploitation and support law enforcement investigations into serious crime and national security matters.

Key actions from our 2023 program of work (customer) included:

<p>Building awareness</p>	<ul style="list-style-type: none"> • Delivered awareness training on family violence and modern slavery to approximately 3,500 frontline bankers in Australia. • Promoting online training modules to frontline bankers (and available to all staff) on our learning platform via internal communication channels. • Ongoing engagement in the Australian Banking Association’s Modern Slavery Working Group. • Supporting the Fintel Alliance in targeting criminal behaviour through transaction monitoring.
<p>Policy and process</p>	<ul style="list-style-type: none"> • Incorporation of modern slavery in our broader ‘at risk’ customer framework. • Continued to make our Human Rights Grievance Mechanism process available for people whose human rights have allegedly been adversely impacted by an ANZ Corporate or Institutional lending customer to raise a grievance. • Continued to make available a process for customers who lack appropriate documentation to open a bank account. • Improved our credit risk assessment process via our Online Customer Profile platform by integrating our Social and Environmental Risk screening tool for large business customers. This allows us to improve our identification of financial and non-financial risks (including reputational risk) we may face through our customer activities, both at an individual customer level and across our portfolio.
<p>Due diligence</p>	<ul style="list-style-type: none"> • Ongoing review of Institutional business customers’ internal documentation and public reporting, with a focus on higher risk countries and sectors. • Continued to update anti-child sexual exploitation algorithms for both Australia and New Zealand to incorporate indicators from recent Fintel Alliance typology reporting. • Increased monitoring of labour hire related to forced labour or human trafficking. • Introduction of monitoring for indicators of sexual servitude. • Ongoing watch list management screening and transaction monitoring across customer accounts. • Implemented name screening for selected entities in higher risk regions.

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INVESTMENTS

Our investments business comprises two distinct parts: ANZ New Zealand Investments Limited and ANZ Private Bank, Australia. Each is considered in the sub-sections below.

ANZ New Zealand Investments Limited

Overview

ANZ New Zealand Investments Limited manages over NZ\$30 billion in funds under management¹ (FUM) for more than 700,000 investors throughout New Zealand, including funds from customers of ANZ New Zealand Private Bank. FUM comprises a range of asset classes including international equities, fixed income, property and listed infrastructure that are managed by third party external managers, and Australasian equities and fixed income that are managed by our team based in Auckland.

Identifying our investment risks

We have determined there is a moderate to lower risk of investing in companies that cause, contribute to, or are directly linked to modern slavery. We require our external and internal managers to incorporate the consideration of modern slavery risks into their investment process.

Building awareness

In 2022, ANZ New Zealand Investments Limited, agreed to actions and key performance indicators related to modern slavery. As a result, an annual online training module on modern slavery training, which outlines the landscape of global modern slavery legislation, trends and risk identification

approaches, has been made available to staff in the Investment Management team and a target was implemented for all staff in that team to complete the training at least once annually.

ANZ New Zealand Investments' Responsible Investment team are members of the Responsible Investment Association of Australasia (RIAA) and the RIAA Human Rights Working Group. Information gathered from external sources such as these are provided to the Investment teams as appropriate. The working group meets quarterly to discuss ways to better engage with investee companies to prevent and address human rights abuses and violations, including modern slavery.

Demonstrating stewardship with the companies we invest in is a core pillar of our Responsible Investment Framework. We, and our third-party external managers, engage with companies that we invest in on ESG and other issues. Human rights are one of the engagement themes, and we publish examples of where we have engaged on human rights, including modern slavery in our biannual stewardship update.

Policy and processes

ANZ New Zealand Investments Limited publishes a **Responsible Investment Framework** that includes detail on integrating ESG considerations into the way ANZ New Zealand Investments Limited research, select and manage investments. The framework covers social factors such as human rights, including modern slavery.

In 2023, the development of a process requiring domestic and external third-party managers to provide confirmation that modern slavery risks are considered in their investment process and is a theme of stewardship activities commenced. The process is expected to be implemented in 2024.

Due diligence

ANZ New Zealand Investments Limited's Responsible Investment and Investment Strategy teams monitor the activities of our domestic and third-party external managers. This monitoring includes requiring our third-party managers to confirm that modern slavery risks are considered across their portfolios, and may also include stock specific modern slavery risks discussions. In addition, our third-party managers screen for modern slavery risks across their portfolios. As part of our ongoing monitoring, the Responsible Investment team may identify companies that have been exposed to controversies (such as human rights issues) and may assess those companies for exclusion from portfolios.

ANZ Private Bank, Australia

Overview

ANZ Private Bank, Australia invests around \$8.2 billion² on behalf of our clients. FUM comprises a range of asset classes including Australian and international equities, Australian and international fixed income, global listed property and infrastructure, high yield debt, alternatives and private markets strategies. Some of the investments are impact investments – i.e. they target (and measure) environmental and social benefits in addition to market returns.

Identifying our investment risks

We have determined a moderate to lower risk of being directly linked to modern slavery through our external fund managers and the sectors, companies and projects in which they invest. The approach to risk assessment is discussed in the identifying, assessing and managing risks section on page 6.

Building awareness

We have encouraged our Chief Investment Office team and advisors to complete the modern slavery online training modules.

Policy and processes

ANZ Private Bank, Australia's Chief Investment Office Sustainable Investing Framework outlines guiding principles and actions that are used with investment managers for our discretionary diversified portfolios. In the framework, modern slavery is a key social factor in our investment decision making process. The framework outlines requirements for external fund managers to complete an ESG questionnaire that asks how external fund managers assess ESG factors and the process they use to integrate their assessment into their investment management process. We also request information on their approach to modern slavery risk, described in the next section. Additionally, we monitor selected MSCI ESG metrics³ across our discretionary portfolios.

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1. As at 30 September 2023. 2. As at 30 September 2023. 3. <https://www.msci.com/esg-metrics>.

Due diligence

We engage with our external fund managers to understand their approach to ESG risk management screening, including modern slavery risk.

By 30 June each year, we request the external fund managers who invest our discretionary diversified portfolios to:

- Provide an overview of their approach to modern slavery, including steps undertaken to understand and assess the modern slavery risks of investee companies’ operations and supply chains.
- Provide a copy of their latest annual modern slavery statement.
- Participate in engagement with ANZ on modern slavery.
- Advise whether they are required to report under the Australian Act.

The modern slavery statements of our external fund managers are used to inform future engagement. We continue to discuss and understand how they are engaging with underlying portfolio companies on modern slavery risks.

Key actions from our 2023 program of work (Investment) included:

Building awareness	<ul style="list-style-type: none"> • Online training modules made available to all Investment Management staff. • A number of employees from the ANZ New Zealand Investments Limited's Responsible Investment team are members of RIAA Human Rights Working Group and feedback information to the Investment teams.
Policy and process	<ul style="list-style-type: none"> • ANZ New Zealand Investments Limited operate under a Responsible Investment Framework. • ANZ New Zealand Investments Limited commenced development of a process to require domestic and third-party external managers to confirm modern slavery is taken into account, including the inclusion of modern slavery in their stewardship process.
Due diligence	<ul style="list-style-type: none"> • As part of our ongoing monitoring, ANZ New Zealand Investments Limited's may identify companies that have been exposed to controversies, such as human rights issues, and may assess those companies for exclusion from portfolios.

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PEOPLE

Most of our people are directly employed and paid by ANZ, providing us visibility and control of payroll processes and conditions. Our workers are highly skilled to provide professional services. The contingent workers we engage are typically also highly skilled from professional service firms.

While the immediate risk of causing, contributing, or being directly linked to modern slavery through our employment practices is relatively low, we continue to take steps and implement controls to manage the potential risks.

Identifying our people risks

Over 67% (28,238) of our 41,849 highly skilled employees live and work in Australia and New Zealand. While we understand these countries have a lower prevalence of modern slavery compared to countries located in the South-East Asia region¹, for example, we know modern slavery can still occur.

Policies and processes

Our commitment to respect human rights in our workplace is embedded in our policies and procedures. Our policies outlined below promote a safe, diverse and inclusive workplace:

- **Human Rights Statement**, as described on page 17.
- **Code of Conduct** which sets out our expected standards of professional behaviour and guides us in applying our values.
- **Equal Opportunity, Bullying and Harassment Policy** and our **Wellbeing and Safety Policy** outline our commitment to supporting our people to feel safe, valued and included.
- **Recruitment Policy** which outlines our internal recruitment protocols, legal and regulatory requirements, including how we source talent.
- **Changing Locations Policy** states that we will comply with legal obligations, and these will prevail over the minimum standards set in each of our policies.
- **Whistleblower Policy** is reviewed regularly (under our Group Policy Framework), and breaches of modern slavery legislation are referenced as a reportable matter under the policy. For more information, see page 16.

We continue to review our policies via our periodic policy review process.

Building awareness

In 2023, we promoted five modern slavery online training modules via our learning platform. These modules cover:

- what modern slavery is and who is impacted;
- how to identify some known red flags associated with modern slavery;
- where modern slavery risks could be at work and at home;
- how to talk about modern slavery with others; and
- knowing when and how to escalate modern slavery concerns.

We will continue to provide all ANZ employees access to the Association of Certified Anti-Money Laundering Specialists Fighting Modern Slavery and Human Trafficking certificate course.



Image: ANZ Centre, Melbourne.

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1. Global Slavery Index (2023) – <https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf>.

OUR GOVERNANCE STRUCTURE

The governance of ANZ's human rights risks, including modern slavery risks, and associated programs of work are discussed at the most senior levels of the bank including Board committees and executive management committees.

Our Board of Directors is responsible for the oversight and approval of our Statement.

Board Ethics, Environment, Social and Governance (EESG) Committee

The Board EESG Committee, chaired by ANZ's Chairman, is responsible for assisting the Board by providing oversight of measures to advance our purpose, focusing on ethical and ESG matters.

In undertaking this role, the Board EESG Committee is responsible for oversight, review and approval of our ESG approach, objectives and performance, including our approach to human rights and modern slavery.

The Board EESG Committee generally meets at least four times annually, meeting five times in 2023. Meetings typically open with an overview of the

ESG operating environment, covering current and emerging issues, including regulatory and parliamentary inquiries, community sentiment, relevant international developments and our stakeholder engagement.

The EESG Committee also reviews ANZ's Ethics and Responsible Business Committee (ERBC) meeting minutes and discusses material matters referred to the Committee from that body. The charter of the Board EESG Committee is available at anz.com/corporategovernance.

Ethics and Responsible Business Committee (ERBC)

The ERBC, chaired by the CEO, comprises Senior Executives and members from business divisions and Group functions.

The ERBC is a leadership and decision-making body that exists to advance our purpose and seeks to ensure ANZ operates responsibly and achieves fair, ethical and balanced stakeholder outcomes. The ERBC approves relevant ANZ policies, such as the Social and Environmental Risk Policy. The ERBC provides leadership on our ESG risks and opportunities, monitoring progress against our ESG targets quarterly.

The ERBC considers the social and environmental impacts of the industries, customers and communities ANZ serves. The ERBC is responsible for overseeing the ERBC Sub-Committee for sensitive wholesale transactions.

The ERBC is accountable to the Board EESG Committee in the effective discharge of its responsibilities. It operationalises Board objectives and makes decisions on issues and policies.

The ERBC meets at least four times annually and met five times in 2023.

The **Modern Slavery Working Group**, led by Group ESG Analytics and Advisory and Group Anti-Bribery and Corruption communicates modern slavery program updates to the ERBC and EESG.

Our channels to raise concerns

We support a 'speak up' culture and seek to promote all staff to take responsibility for managing risks. In our anonymous 2023 My Voice employee engagement survey, we asked specific questions related to expressing ideas and raising concerns without fear and observed 84% of employees feel confident to speak up at ANZ.

We have multiple channels available for raising concerns about modern slavery. The following are examples of channels available to our employees or the employees of our suppliers:

- People Manager, Group ESG Analytics and Advisory, and Group Procurement team
- Human Rights Grievance Mechanism
- Whistleblower Channel
- Group Integrity
- Financial Crime teams via suspicious reporting mechanisms
- Internal Compliance and Operational Risk system (COR).

Our Human Rights Grievance Mechanism

We support the UNGPs, including via access to our Human Rights Grievance Mechanism (the Mechanism). This is available to people and communities who believe their human rights have been impacted by ANZ's Institutional or Corporate lending customers.

For a grievance to be accepted into the Mechanism, the customer must consent to both ANZ disclosing the existence of a current or former lending relationship to the Affected People and to participating in the Mechanism.

The Mechanism is designed to promote responsible business conduct, under a framework through which:

- efforts can be made to resolve grievances; and
- recommendations aimed at strengthening our due diligence processes can be provided.

Details about our Grievance Mechanism and how to lodge a grievance is available on our website's Human Rights page¹.

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1. <https://www.anz.com.au/about-us/esg/fair-responsible-banking/human-rights/>.

Whistleblower Policy and Program

The Whistleblower Policy and Program is a key component of our strong and effective conduct risk management and corporate governance framework. We apply Australian whistleblower regulations across the markets in which we operate. Additional jurisdiction-specific regulations imposing higher or contrary obligations are captured in schedules within the Policy.

The Whistleblower Program is one of many channels encouraging and empowering our people to speak up and raise misconduct concerns, freely and without fear of reprisal. The policy and program provide strong protections for individuals who disclose misconduct and play a pivotal role in maintaining the integrity of the organisation. Information received through the Whistleblower channel helps us identify misconduct that may not otherwise be detected and to act on issues which do not support our purpose, values and expected behaviours.

An actual or suspected breach of modern slavery legislation is listed as a reportable matter under the Whistleblower Policy.

All employees and contingent workers are required to undertake annual mandatory training on their obligations and responsibilities under the Whistleblower Policy. Role-specific training for whistleblower investigators, Whistleblower Protection Officers, and eligible recipients of whistleblower reports (including Executive Committee members and new Board members) was delivered to ensure relevant employees understand obligations under applicable laws and how to appropriately handle and investigate reports.

Financial crime reporting mechanisms

This year, our Financial Crime Coverage team performed a Modern Slavery Typology Assessment which was based on intelligence sources and risk indicators on this topic. Outcomes of the Typology Assessments – e.g. emerging risks identified or impacts to detection control coverage – are discussed with Financial Crime Threat Management Control Owners in our regular Detection Design Working Group and Detection Coverage Forum.

The Financial Crime Intelligence team was also involved in various threat assessments and reviews related to modern slavery sub-topics including:

- Threat Assessments, including a review of existing customer transactions, to understand risks such as child sexual exploitation, sexual servitude, labour hire related to forced labour or human trafficking.
- Industrialisation of new dynamic algorithms to detect activities such as sexual servitude and underage producers of child sexual materials.
- Special Interest Categories list screening including modern slavery categories.

Internal Compliance and Operational Risk system (COR)

As part of ANZ's Operational Risk & Compliance Framework, any compliance incidents involving a potential breach of the law, regulation, industry standards and codes or internal policies and procedures is recorded on COR. Issues on COR are escalated through the Compliance function to the relevant stakeholders as appropriate.

International standards and collaboration

We consider internationally recognised human rights frameworks, standards and goals when developing our approach to assessing and addressing modern slavery risk, including:

- Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.
- United Nations Guiding Principles on Business and Human Rights.
- Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises.
- Sustainable Development Goals – including target 8.7 to eradicate forced labour and end modern slavery and human trafficking.

We are signatories to the following:

- **United Nations Global Compact** – encourages businesses to adopt sustainable and socially responsible policies, and report on implementation.
- **Business Council of Australia's Australian Supplier Payment Code** – a voluntary commitment to pay Australian small business suppliers within 30 days. On average at ANZ payment was made in 14 days from receipt of the invoice in 2023.

Over the past several years we have engaged with other organisations to improve understanding and develop ideas to manage modern slavery risk including:

- United Nations Global Compact Network Modern Slavery Community of Practice.
- Australian Banking Association Modern Slavery Working Group, which aims to develop an industry position on the practical response to Modern Slavery in member Banks.
- ANZ employees worked with the Association of Certified Anti-Money Laundering Specialists in relation to certificate level training on 'Fighting Modern Slavery and Human Trafficking'.
- Fiji Commerce and Employers Federation.
- New Zealand Ministry of Business, Innovation and Employment on ethical and sustainable work practices for lenders, with a focus on migrant exploitation.

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POLICIES AND PROCESSES

ANZ seeks to respect the human rights of our employees, customers and the people in our communities.

We expect the same commitment to human rights from everyone who works for or with us including our employees and people with whom we have business relationships¹. Our Human Rights Statement is informed by the UNGPs and includes:

- No tolerance for retaliation against individuals, communities or human rights defenders;
- Reference to our Climate Change Commitment, which refers to the human rights impacts of the net zero transition;
- Support for an open civic space;
- Our approach when domestic laws conflict with international human rights standards; and
- Our process when a customer's human rights practices are inconsistent with our expectations.

Our approach is consistent with our policies and other relevant documents available at anz.com including:

- **Anti-Bribery and Anti-Corruption Policy** – outlining standards of conduct for ANZ, our employees and our contingent workers, and appropriate due diligence on third parties.
- **Land Acquisition Position Statement** – outlining our support for customers who are implementing appropriate standards for land acquisition and resettlement, including their engagement with the community and other key stakeholders.
- **Approach to Accessibility and Financial Inclusion** – making our products, services, workplace and culture supportive of people with disability and improving outcomes for those at risk of financial exclusion.
- **Climate Change Commitment** – responding to the social, environmental and economic challenges of climate change.
- **Diversity and Inclusion Policy** – committing to strive to be a workplace that reflects the communities in which we operate and provides opportunities to underrepresented groups.
- **Equal Opportunity, Bullying and Harassment Policy** – committing to strive to be a workplace free from discrimination, harassment, bullying and victimisation.
- **Reconciliation Action Plan** – stating our commitment to social and economic participation of Aboriginal and Torres Strait Islander peoples.
- **Social and Environmental Risk Policy and Screening Tool** – outlining our social and environmental standards and due diligence for large business customers of ANZ.
- **Supplier Code of Practice** – outlining our requirements for suppliers including in relation to labour rights, workplace health and safety and freedom of association.
- **Complaints processes** – providing communication channels to raise complaints including our Human Rights Grievance Mechanism.
- **Enhanced Human Rights Due Diligence Screening** applies to our Institutional and Corporate banking customers operating in high-risk sectors and countries, or those subject to allegations of modern slavery or like practices. It assists our employees in obtaining further information from customers, which is factored into our social and environmental risk screening tool.
- **Reputation Risk Radar** – a service which monitors certain reports of social and environmental, and significant governance incidents and allegations against existing and prospective ANZ customers. Notable incidents and allegations are referred, where appropriate, to our risk management forums in which social, environmental and credit risks are considered.

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¹ Business customers, suppliers and partners.

MONITORING EFFECTIVENESS

Defining metrics that measure success in uncovering, identifying and managing modern slavery risk is challenging. Meaningful engagement between business, law enforcement and civil society is required to help define actions that are most effective at helping victims of modern slavery. We look at quantitative and qualitative measures to track our progress, inform improvements to our approach and measure our effectiveness across our modern slavery program of work.

Priority Area	What we measure	2023 outcomes
Building awareness through training and education	Number of Modern Slavery online training modules completed by staff ¹	185
	Number of staff who completed our Social and Environmental Risk online training modules ¹	844
	Number of staff who completed our Social and Environmental Risk training via webinars ¹	113
	Number of frontline bankers provided with 'awareness training'	Approximately 3,500
	Developing a speak up culture where staff feel comfortable to ask question and raise issues	84% – up from 83% in prior year
Governance, policy and process	Modern slavery working groups meet to discuss developments and track progress on action plans	Each of the working group sub-streams met at least six times
	Updates to contractual documents undertaken	<ul style="list-style-type: none"> Inclusion of modern slavery clauses in existing supplier contracts
	Updates to frameworks and processes undertaken	<ul style="list-style-type: none"> Incorporated specific reference to modern slavery in our broader 'at risk' framework Updated our anti-child exploitation algorithms Implemented additional name screening for selected entities in higher risk regions Inclusion of Social and Environmental Risk screening tool into our online customer profile for Institutional customers
Undertaking due diligence	Number of suppliers screened as part of Group Procurement's ongoing supplier due diligence	5,292
	Percentage of top 100 suppliers (by spend) screened	100%
	Number of third-party due diligence engagements completed	More than 2,500
	Number of Social and Environmental Risk screenings undertaken	2,689

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¹ While the training modules are available to all ANZ staff, they are most applicable to the relatively small number of our people whose role is more directly exposed to potential human rights risks, including modern slavery. Those individuals are involved in procurement, investment management and the relationship management of Institutional customers as detailed in "Identifying, assessing and managing risks" from page 6.

We strive to continually improve our approach to identifying, assessing, and managing modern slavery risks in our operations and supply chain.

This Statement was approved by the Board of ANZ Group Holdings Limited (ANZGHL) on 22 February 2024. ANZ Group Holdings Limited is a 'higher entity' within the meaning of section 14(2)(d)(ii) of the *Modern Slavery Act 2018* (Cth), being the entity in a position to influence or control each other reporting entity covered by this Statement.

This Statement is signed by Shayne Elliott in his role as Chief Executive Officer, Executive Director ANZ.



Shayne Elliott Chief Executive Officer

22 February 2024



Image: ANZ Centre, Melbourne.

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MANDATORY CRITERIA REFERENCE TABLE

The table below provides reference pages for the relevant disclosures in each criterion for both the Australian Act and UK Act.

Australian Commonwealth Modern Slavery Act 2018 reporting criteria	United Kingdom's Modern Slavery Act 2015 requirements	2023 Modern Slavery Statement page reference
(1) Identify the reporting entity	N/A	3
(2) Describe the structure, operations and supply chains of the reporting entity	54(5)(a) the organisation's structure, its business and its supply chains	5
(3) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	54(5)(d) the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	6-16
(4) 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	54(5)(b) its policies in relation to slavery and human trafficking; (c) its due diligence processes in relation to slavery and human trafficking in its business and supply chains; and (f) the training about slavery and human trafficking available to its staff	4 and 6-16
(5) Describe how the reporting entity assesses the effectiveness of such actions	54(5)(e) its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	15-16 and 18
(6) Describe the process of consultation with any entities that the reporting entity owns or controls. In the case of a reporting entity covered by a statement under section 14 – the entity giving the statement	N/A	5
(7) Include any other information that the reporting entity, or the entity giving the statement, considers relevant	N/A	18

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