



A S Harrison & Co



Harrison
Manufacturing

H Harrison
Investments

SPARC
Strategic Projects and Advanced Research Centre

Modern Slavery Statement

1 July 2020 – 30 June 2021

Foreword from the Chairman

Clareville Pty Limited (Harrison) is built on the values of Integrity, Quality, Innovation, Safety and Success. These values underpin all our business relationships and operations and help ground us on our journey as a leading supplier of high value finished products, ingredients, additives, and technical solutions. Moreover, these values ensure that we act ethically and mitigate modern slavery and human trafficking risks in our operations and supply chains.

Harrison acknowledges that modern slavery and human trafficking is a global and complex challenge faced by both governments and businesses. This is our first modern slavery statement under the Modern Slavery Act 2018 (Cth) (Modern Slavery Act), however for several years we have been making efforts to raise and address modern slavery risks arising in relation to our operations and business (through modern slavery policies and training). Under the Modern Slavery Act, entities who meet the reporting threshold and do business in Australia must prepare and publish a modern slavery statement for each financial year. Harrison is committed to complying and supporting the aims of the Modern Slavery Act in identifying, mitigating and monitoring modern slavery risks. Harrison strives to ensure that both modern slavery and human trafficking do not occur in our business operations or supply chain.

We acknowledge that entities such as Harrison play a major role in combatting modern slavery in global supply chains. In this modern slavery statement (Statement), we discuss the ongoing efforts to ensure compliance with modern slavery regulations. However, as this is Harrison's first reporting period we note that we are at the beginning of our modern slavery compliance journey, and we are working towards addressing and mitigating our modern slavery risks.

This Statement outlines our future plans to continue to work towards combatting modern slavery risks, and Harrison is committed to developing our approach to combat this complex and very important issue over the coming years.

Principal Governing Body Approval

This modern slavery statement was approved by the Board of Clareville Pty Limited (ABN 42 003 038 668) in their capacity as principal governing body of Clareville Pty Limited (in accordance with section 13 of the Modern Slavery Act 2018 (Cth)) on 15th December 2021.

Signature of Responsible Member

This modern slavery statement is signed by Geoffrey Charles Harrison in their role as the Chairman of Clareville Pty Limited (ABN 42 003 038 668) (in accordance with section 13 of the Modern Slavery Act 2018 (Cth)) on 15th December 2021.



Geoffrey Charles Harrison

Chairman, Clareville Pty Limited

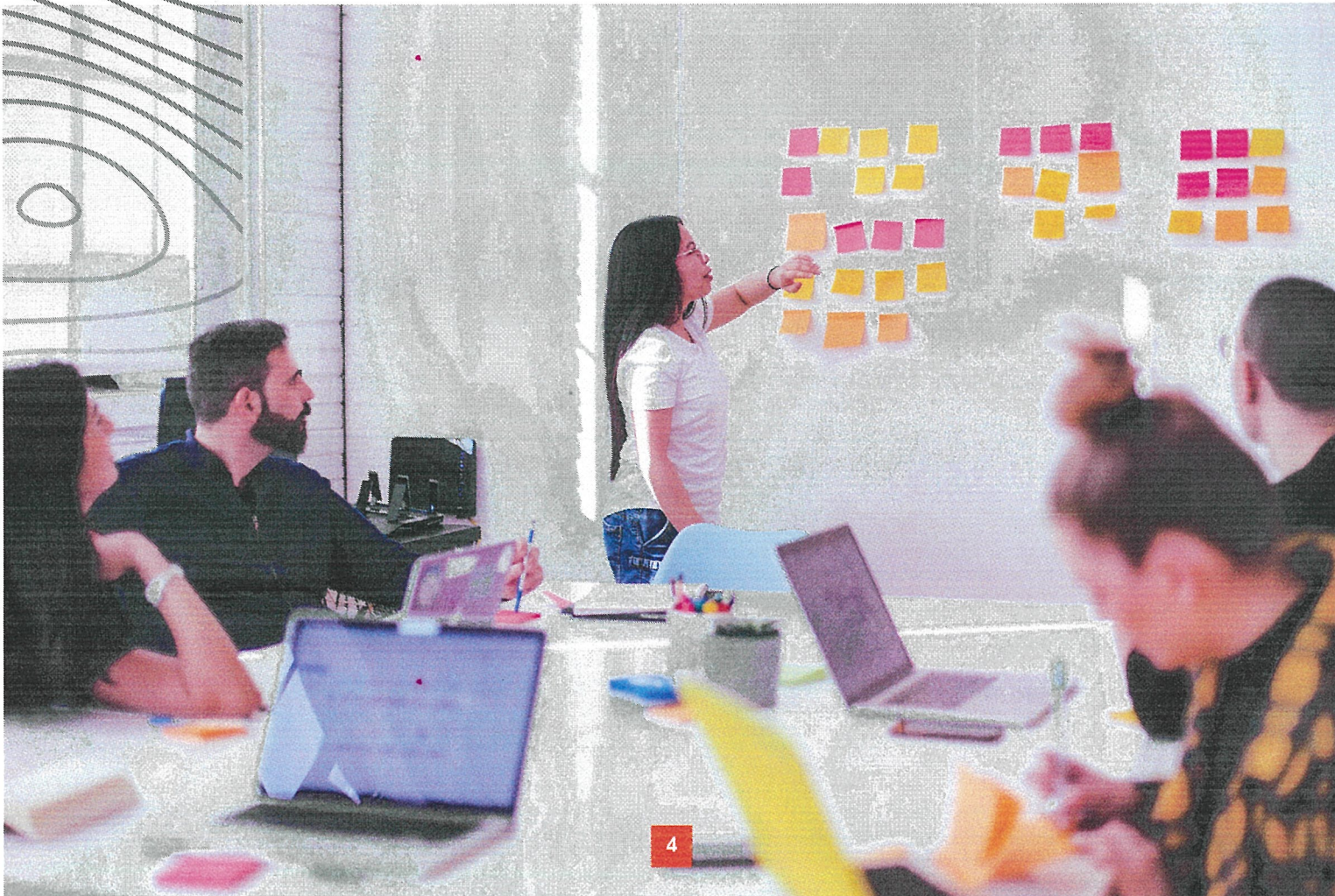
15th December 2021

Contents

1.	Criterion 1: Identify the reporting entity	4
2.	Criterion 2: Describe the reporting entity's structure, operations and supply chains	5
2.1	Our Structure	5
2.2	Our Values	5
2.3	Our Operations	5-6
2.4	Our Supply Chains	6-8
3.	Criterion 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	9-10
4.	Criterion 4: Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	11
4.1	Actions taken in the reporting period to assess and address modern slavery risks	12
5.	Criterion 5: Describe how the reporting entity assesses the effectiveness of these actions	13
6.	Criterion 6: Describe the process of consultation with any entities the reporting entity own or controls	14
7.	Criterion 7: Provide any other relevant information	15
7.1	Shea Butter project in Ghana	15
7.2	Organic Rosehip Oil from Chile	15
7.3	The Impacts of COVID-19	15
7.4	Looking ahead	15-16
	MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE	17

1. Criterion 1: *Identify the reporting entity*

- 1.1 This modern slavery statement (Statement) is made by Clareville Pty Limited, ABN 42 003 038 668, 75 Old Pittwater Road, Brookvale NSW 2100 (referred to as we, us, our, Harrison in this Statement).
- 1.2 Harrison is a reporting entity under the Modern Slavery Act 2018 (Cth) (Modern Slavery Act) and this Statement is submitted and published for the financial year ending 30 June 2021.
- 1.3 This Statement is made on behalf of Harrison and its associated entities (referred to as Harrison Group in this Statement), and includes:
- Harrison Manufacturing Co Pty Limited ACN 000 080 946;
 - A S Harrison & Co Pty Limited ACN 000 030 437;
 - Harrison Investments Pty Limited ACN 000 085 674;
 - Harrison SPARC Pty Limited ACN 651 594 482; and
 - A S Harrison & Co Pty Limited (NZ) NZCN 530 8601.
- 1.4 Harrison makes this Statement in accordance with section 13 of the Modern Slavery Act as a single reporting entity.
- 1.5 Our Statement covers all of the 7 mandatory criteria for reporting as set out in section 16 of the Modern Slavery Act. In preparing this Statement, we have used the Commonwealth Guidance for Reporting Entities and recently issued Modern Slavery Act Supplementary Guidance to help inform and guide our approach.



2. Criterion 2: Describe the reporting entity's structure, operations and supply chains

2.1 Our Structure

Harrison is an Australian unlisted company that is limited by shares incorporated in New South Wales, Australia.

Harrison wholly owns and controls the following entities:

Entity	Description of entity
Harrison Manufacturing Co Pty Limited (ACN 000 080 946) (Harrison Manufacturing)	Harrison Manufacturing specialises in the development, manufacture and supply of high performance grease, lubricants and advanced products and services (which include technical support).
A S Harrison & Co Pty Limited (ACN 000 030 437) (A S Harrison AU)	A S Harrison AU specialise in distributing manufactured chemical additives and providing associated services for certain industries (such as petroleum, oil and gas).
Harrison Investments Pty Limited (ACN 000 085 674) (Harrison Investments)	Harrison Investments manages the strategic planning for Harrison Group's facilities requirements (such as managing properties at which the various Harrison Group entities operate).
Harrison SPARC Pty Limited (ACN 651 594 482) (Harrison SPARC)	Harrison SPARC is used for research and development purposes, to develop IP for use by Harrison Manufacturing, or to sell to others.
A S Harrison & Co Pty Limited (NZ) (NZCN 5308601) (A S Harrison NZ)	A S Harrison NZ distributes manufactured chemical additives, and provides associated services for certain industries (such as petroleum, oil and gas).

2.2 Our Values

Harrison's values of Integrity, Quality, Innovation, Safety and Success guide the Harrison Group to act ethically in all our business relationships, operations and supply chains. Our ethical practice is reflected by all our officers, directors, employees, and contractors to ensure we are providing the best services to our partners and customers.

2.3 Our Operations

As per the Commonwealth Guidance, 'operations' refers to activities undertaken by the entity to pursue its business objectives and strategy in Australia or overseas. This includes the manufacturing, distribution and procurement of products and services. Whilst the Harrison Group is based in Australia and New Zealand, we also supply and service customers in the South Pacific, South East Asia, United Arab Emirates, United Kingdom, Papua New Guinea, Italy, China and India.

Our key operations involve:

- importing chemical products from manufacturers of chemicals and representing those manufacturers to promote, sell and service their products. We import chemical additives for a range of industries such as the petroleum, lubricant, oil and gas, food, personal care and nutraceutical markets;
- offering a variety of services (including technical services) that assist in the transportation, storage, dosing, repackaging and use of chemical additives – for instance within the oil and gas sector we provide flow assurance additives, and associated engineering equipment;

2.3 Our Operations

- (c) manufacturing and supplying grease and lubricant products to various industries such as the mining, construction, agricultural and marine industries; and
- (d) providing additional services in relation to our manufactured goods that assist in the use of our products (such as testing services, grease bin management and training).
- Harrison has a total of 116 employees based in its offices and warehouses in Australia and New Zealand.
 - The Harrison Group entities employ their staff directly and via accredited employment agencies. A S Harrison AU in particular have been awarded the HRD Employer Choice Award in 2020 and 2021 which considers companies initiatives and achievements in relation to leadership, learning and development, wellbeing, flexibility, diversity and inclusion, work-life balance and recruitment. Harrison Group entities may also employ student interns and casual staff. All interns and casual staff are paid in accordance with statutory requirements and managed by accredited employment agencies.
 - Our headquarters are in Brookvale, NSW. We operate out of offices in Sydney, Perth and Auckland and utilise contract warehousing for distribution of products located in Sydney, Brisbane, Melbourne, Perth, Adelaide, Auckland, Christchurch, New Plymouth (NZ) and Singapore.
 - Our manufacturing factory is located in Sydney on our Brookvale site at 75 Old Pittwater Road, Brookvale, NSW, 2100.

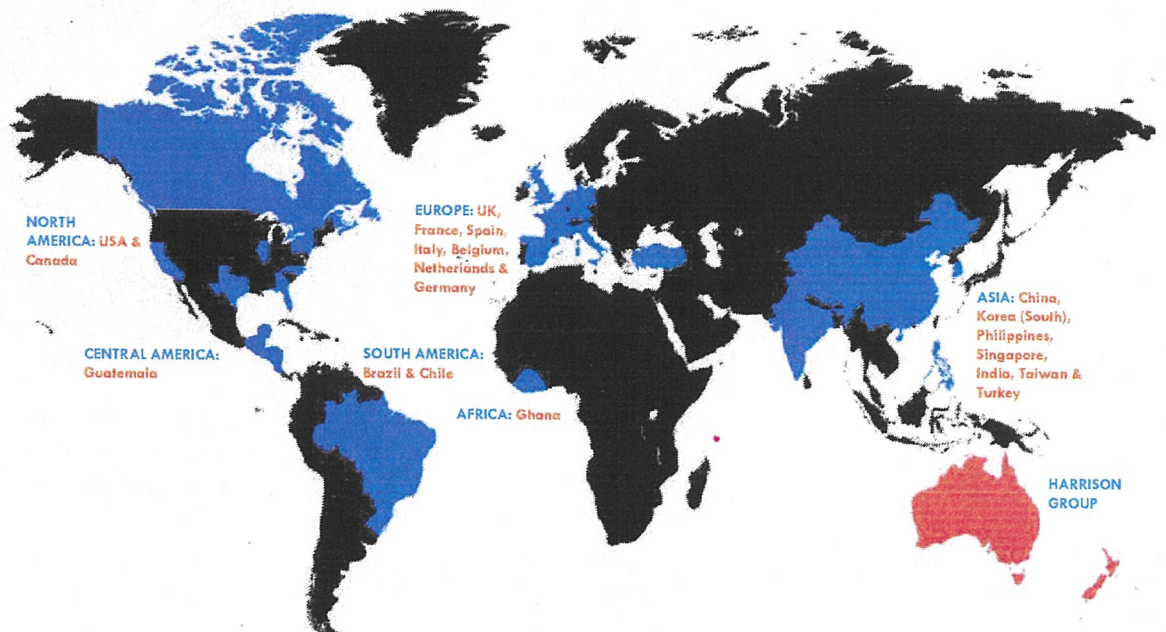
2.4 Our Supply Chains

As part of Harrison Group's operations, we procure raw materials for manufacturing purposes as well as chemical additives and equipment for distribution and use in the Australian and New Zealand markets, to support our partners and customer base. We procure the following goods as part of our operations:

Goods	Country of Manufacture
Personal care additives	Canada, France, India, United Kingdom, United States of America, Taiwan, South Korea, China, Italy, Spain, Ghana.
Food additives (such as meat powders, seafood powders and cheese and dairy powders)	China, Netherlands, Turkey, Belgium, India.
Botanical extracts, nutrition and health oils	France, China, Chile, Guatemala
Fuel additives	United States of America, United Kingdom, China, Germany, Philippines
Lubricant additives	United States of America, France, South Korea, Singapore, China, Brazil
Grease additives	United States of America, France, South Korea, Singapore, China, Brazil
Construction chemicals	Spain, Italy, France, United States of America
Corrosion inhibitors	United States of America
Water treatment chemicals	United States of America

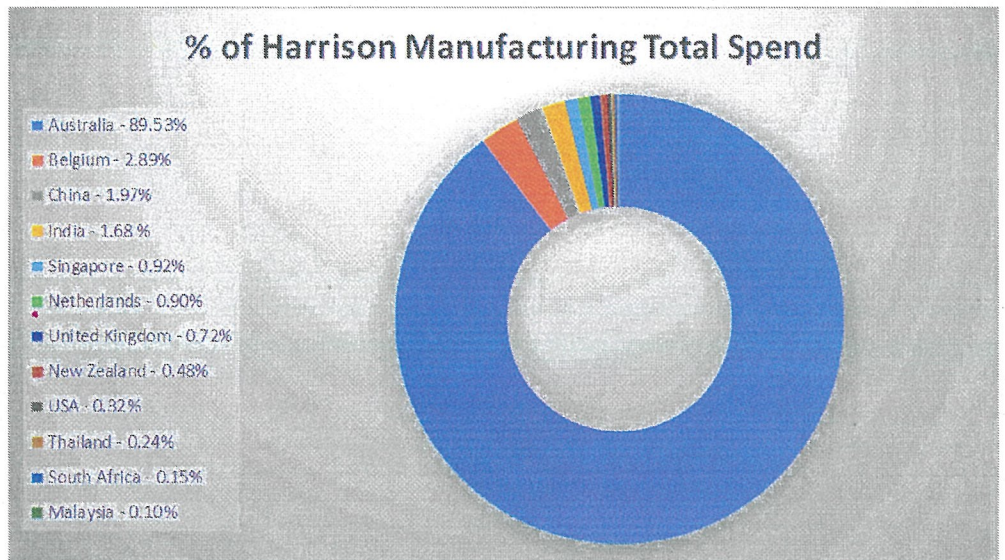
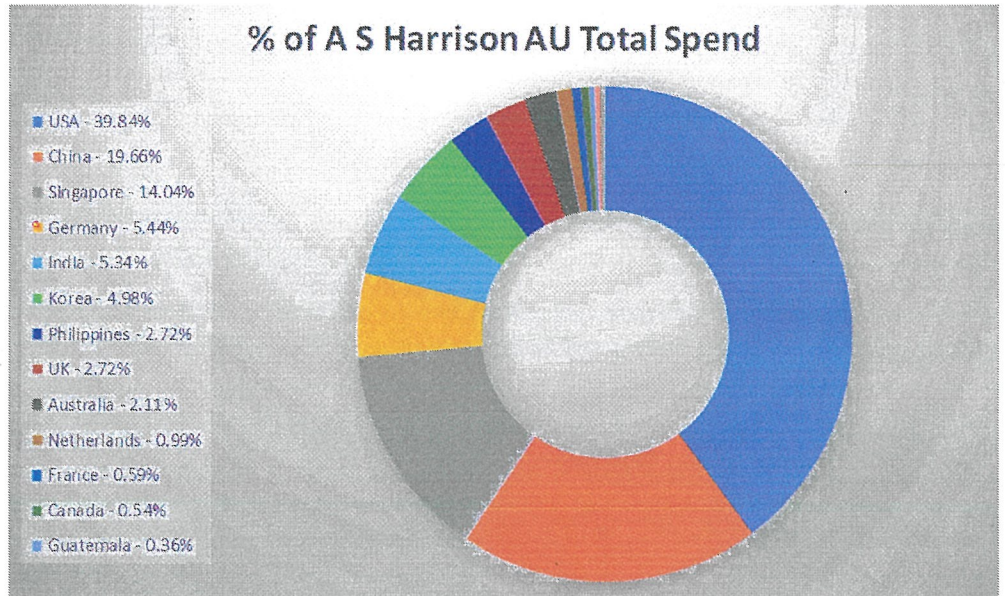
Goods	Country of Manufacture
Suspending and dispersing agents for agriculture	United States of America
Surface coatings, paints and related products	United States of America
Chemical additives for the engineering sector	United States of America
Aviation and Military grade lubricating oils, greases and allied products	United States of America, United Kingdom
PTFE lubricants	United States of America
Lithium hydroxide	United States of America, Chile
Castor oil derivatives	India
Petroleum base oil	Manufactured by oil refineries in Asia Pacific, Europe and United States of America. Sourced through local and overseas traders
Molybdenum disulphide	China and India

The majority of goods that we procure come from suppliers based in the countries shown below:



2.4 Our Supply Chains

The break down of countries in which our raw material suppliers are based is shown below:



The Harrison Group expects suppliers to comply with all labour laws in the various countries where they operate. We are looking to implement a supplier code of conduct with appropriate contractual obligations as part of our prioritised risk based approach (see Section 7.4 – Looking Ahead).

- The Harrison Group utilises intermediaries in our supply chain including shipping lines, airlines, road transport companies and financial institutions.
- The Harrison Group utilises contractors to provide professional cleaning services for our offices & the factory site at Brookvale.

3. Criterion 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

Harrison recognises that modern slavery risks are constantly evolving. This is because particular operations and particular supply-chains carry higher modern slavery risks than others. Not only do specific industries and products carry more risks but the geographical location of some suppliers as well as their supply chains and operations can impact the modern slavery risks involved. Furthermore, we lack visibility with the secondary levels of our chain of suppliers and source of materials used in producing our goods.

- In this section we identify the 'risks of modern slavery practices', meaning the potential for the Harrison Group to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.
- In this context, 'risk' means to people, rather than the risks to Harrison Group (such as reputational or financial damage).

As this is our first reporting period, Harrison has:

- (a) issued an internal business stakeholder survey to each of the Harrison Group entities to identify potential risks in our operations and supply chains and to ascertain what steps already are in place to assess and address such risks; and
 - (b) completed a high level thematic review of our modern slavery risks in our operations and supply chain using known modern slavery indicators.
- As discussed in paragraph 7.4 below, in the next reporting period we intend to formalise our priorities in relation to modern slavery and create a strategic roadmap to address modern slavery risks.

We have identified the following key risks within our operations and supply chain:

(a) **Sector and industry risks:** The Commonwealth Guidance for Reporting Entities identifies high risk industries globally. The Harrison Group engages with suppliers in the extractives, agriculture and cleaning sectors, all of which have been classified as high risk industries. The extractives sector includes mining and construction, and is deemed high risk because suppliers may engage in unethical practices such as extracting conflict minerals. Both the agriculture and mining sector are deemed high risk as child labour is prevalent in these industries. The cleaning sector is also high risk because it tends to rely on the use of foreign workers or temporary or unskilled labour to carry out functions which are not immediately visible because the work is undertaken at night time or in remote locations.

(b) **Product and services risks:** Although we do not procure any raw materials from mines or other sources ourselves, further down our supply chain (i.e. sub-suppliers) may procure raw materials which may involve use of mines, smelters and refineries which could have higher modern slavery risks. Additionally, services such as cleaning are recognised as high risk. The majority of our products are made from petrochemicals and oleochemicals. Whilst we do not directly procure palm oil, this may be used to make the chemicals which we source for the production of our products. We recognise that these inputs may carry a higher modern slavery risk.

(c) **Geographic risks:** Suppliers from certain countries have higher risks of modern slavery. *The Global Slavery Index 2018 of the Minderoo Foundation* (Index) ranks countries based on the government response to modern slavery. The Index identifies 10 countries that are taking the least action against modern slavery risks – Harrison has not identified that any of its suppliers operate in those countries. However, many of our suppliers are based in countries with high risks of modern slavery such as China and India. We also have significant suppliers located in China in Jiangsu and Shaanxi provinces. Nevertheless, a majority of the countries that our suppliers operate in are considered to be taking the most action against modern slavery (e.g. United States, Netherlands, Spain and United Kingdom).

(d) **Entity risks:** Our physical audits and inspections of our supplier's factories and workspaces means we generally have good oversight in respect of the entities we work with. To date we have not identified any instances of a specific modern slavery incident or a poor record track record of human rights violations. However, we acknowledge that there are some entities where we have less oversight. For example, the Harrison Group does not have complete oversight over where certain products are packaged (in the case that those products are manufactured or produced at a different location).

We acknowledge we have sub-suppliers in industries such as transportation (i.e. shipping) which are known to have higher risks of modern slavery and therefore there may be modern slavery risks that we have not identified yet.

Harrison plans to take a prioritised risk based approach to dealing with risks in our operations and supply chains, and over the next reporting period it intends to:

(a) identify its strategic priorities based on risk and informed by our risk mapping work to date; and

(b) focus on a more detailed modern slavery risk assessment, including issuing modern slavery surveys to higher risk suppliers in priority areas.



4. Criterion 4: Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

This is Harrison’s first reporting period under the Modern Slavery Act – whilst we have taken some actions to assess and address modern slavery risks, we believe we are at the beginning of our modern slavery compliance journey, and are committed to further developing and implementing our strategic modern slavery compliance roadmap. We acknowledge that we have a complex supply chain and as a result we have taken a prioritised approach to identify, prevent, mitigate actual or potential adverse modern slavery violations. Over the reporting period, as with many other entities, the COVID-19 pandemic has meant that we could not travel, which made it difficult to realistically implement our modern slavery mitigation objectives.

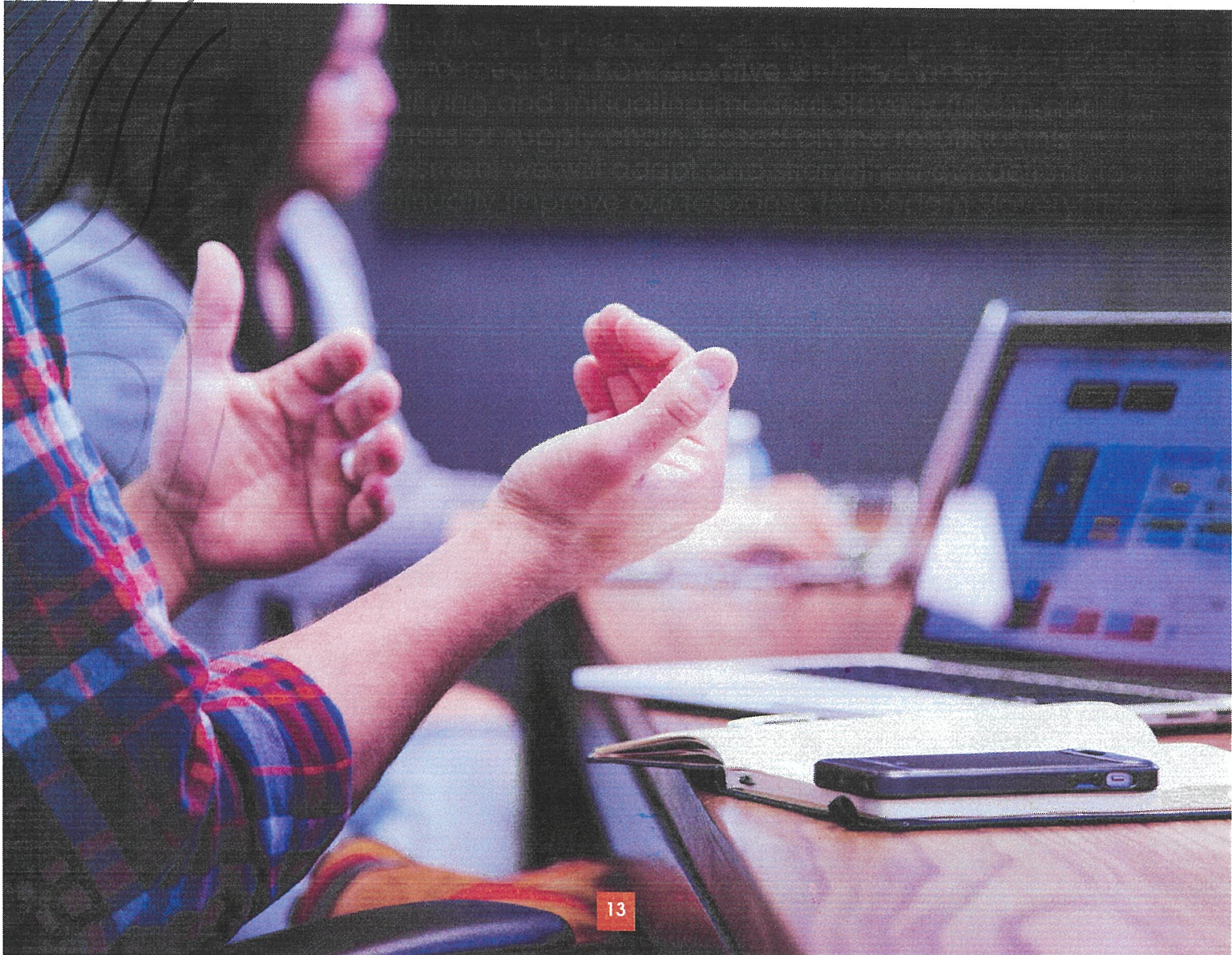
4.1 Actions taken in the reporting period to assess and address modern slavery risks

In this reporting period, we have focussed on:

Actions	Description
Supplier Due Diligence	<p>Not all Harrison Group entities currently have in place an ongoing management process to identify, prevent, mitigate and account for how we address actual and potential modern slavery risks in our operations and supply chains. However we do engage in some due diligence in relation to our business relationships with suppliers.</p> <p>A S Harrison AU require that any new suppliers complete its ‘New Supplier Risk Assessment’.</p> <p>From the information provided by the supplier on this Assessment, A S Harrison AU assesses (before the supplier is onboarded):</p> <ul style="list-style-type: none"> • how their ethical sourcing policy is implemented; • whether they have in place documented training and re-training programs; and • whether there are any evident child labour/ modern slavery practices used by the supplier. <p>During the reporting period, the inability to travel during the COVID-19 pandemic has made it difficult to conduct realistic due diligence on our suppliers, as we normally would do.</p>
Modern Slavery Policy	<p>Our Modern Slavery Policy covering our importation activities was implemented in 2019 – it considers our structure, operations, supply chains, steps taken to mitigate modern slavery risk and the effectiveness of these steps. As per our modern slavery policy, over the reporting period certain entities of the Harrison Group have required all our directors, officers, employees and contractors to maintain the highest ethical standards and follow our internal policies to minimise modern slavery risks. Additionally, as per the policy, over the reporting period employees were required to promptly report any concerns or suspicions regarding the occurrence of modern slavery in our business or supply chain.</p>

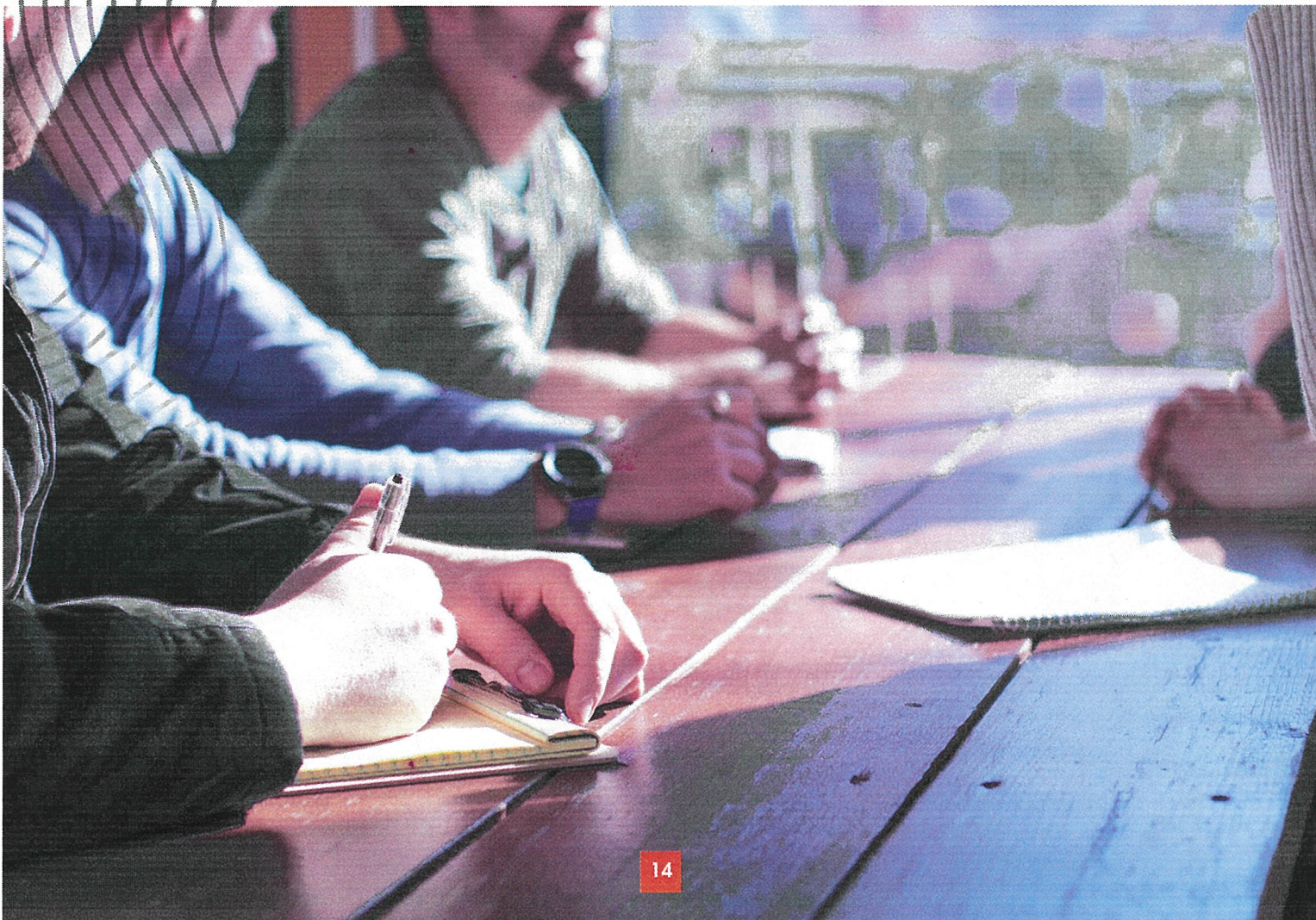
Actions	Description
Staff Training	<p>In this reporting period, A S Harrison AU has conducted modern slavery training for our staff to ensure that they are aware of slavery and human trafficking risks. The training was conducted by a leading law firm on behalf of the company. Our training materials train staff on modern slavery risk indicators and what to do if modern slavery risks or incidents are found or suspected. The staff are also provided training on a range of compliance topics as well as cross cultural training so they can better identify modern slavery risks.</p> <p>We have several procurement members in Harrison Manufacturing completing a course on identifying modern slavery in the supply chain at the University of Technology Sydney. We aim to roll out further general awareness training across Harrison Group entities.</p>
Internal Assessment	<p>As part of A S Harrison AU's application to join EcoVadis (which is a global provider of business sustainability ratings), we conducted a sustainable procurement audit which included auditing our labour practices and human rights approach. Over the reporting period, the feedback from EcoVadis was used to direct future plans for dealing with modern slavery in our supply chain.</p>
Remuneration and recruiting	<p>Harrison uses labour monitoring and payroll systems to check eligibility of employees in Australia before they are hired. We also ensure right to work at time of hiring – whether it be via particulars viewing and copying of valid documents – eg passports and/or visas. We observe the provisions of the Workplace Relations Act 1996 (Cth) and Fair Work Act 2009 (Cth); regarding minimum wage requirements for which we fully comply (and are usually well above).</p> <p>Harrison Manufacturing have a number of employees covered by an Enterprise Agreement which has been agreed with a registered trade union and endorsed by the Fair Work Commission as being above the minimum requirement.</p> <p>Harrison, as holding company, lays down overarching policies for the group specifying fair pay standards for its employees.</p>
Supplier vetting and monitoring	<p>Over the reporting period, the Harrison Group used its desktop supplier audit forms (which includes a modern slavery assessment), and where possible undertook physical audits of our suppliers, to identify any modern slavery risks.</p> <p>Prior to the COVID-19 outbreak we visited several overseas suppliers over many years and did not detect any instances of modern slavery. Travel difficulties due to COVID-19 have made it difficult to assess suppliers over the past 12 months.</p>

5. **Criterion 5: Describe how the reporting entity assesses the effectiveness of these actions**
- 5.1 A S Harrison AU intends to use key performance indicators (KPIs) to measure how effective we have been in identifying and mitigating modern slavery risks in our business or supply chain. Based on the results of this assessment we will adapt and strengthen our actions to continually improve our response to modern slavery. These KPIs include the following:
- number of staff trained on modern slavery issues;
 - number of supplier audits;
 - collaboration with our suppliers to develop an improvement plan to address new and previously identified slavery and human trafficking issues; and
 - an annual review questionnaire for existing suppliers to conduct a self-assessment of modern slavery issues, which allows us to identify these issues early on and track supplier's improvements with their data.



6. Criterion 6: Describe the process of consultation with any entities the reporting entity own or controls

- Harrison engaged and consulted with all Harrison Group entities to discuss the Modern Slavery Act's reporting requirements, as addressed in this Statement.
- Specifically, in November 2021 we held a Board meeting in which all Harrison Group entities discussed this Statement (including the risks identified in this Statement and actions taken in the reporting period). In addition, we also discussed our strategic approach on how to reduce and mitigate modern slavery risks in the next reporting period.
- Harrison is developing a continuous improvement program to address modern slavery risks. This program includes executives from all Harrison Group entities and consultation has primarily occurred through Microsoft Teams.



7. Criterion 7: Provide any other relevant information

7.1 Shea Butter project in Ghana

- Harrison recognises that a root cause of modern slavery is poverty and unfair pay in developing countries. We are addressing these issues in Ghana through our partnership with Deluxe Shea Butter Australia. Deluxe Shea Butter Australia supplies certified organic and fair for life shea butter directly from traditional communities in Ghana.
- In Ghana poverty is increasingly concentrated in rural regions where most low-income families rely on cocoa farming for their livelihoods. Our supplier works with women co-operative groups for the processing of our organic fair for life shea butter, respecting age-old traditions and supporting local communities and families. This partnership supports Ghanaian communities and gives them a fair go with a fair day's pay for a fair day's work.

7.2 Organic Rosehip Oil from Chile

- We source organic rosehip oil from Chile and our agreement with this supplier includes a "fair for life" clause. Under this clause the Harrison Group pays an extra 10% on all products marketed and sold as Certified Fair for Life. By paying the "fair for life" price Harrison Group allows our supplier to pay an extra 5% to its producers, which significantly improves their livelihood.

7.3 The Impacts of COVID-19

- The impact of the COVID-19 pandemic on workers, government, civil society groups and organisations has been significant. We have tried to ensure that our employees have been well supported during this period by maintaining our EAP services and creating a flexible work environment.
- Additionally, we have maintained that our staff stay up to date on their training and conducted training specifically for modern slavery. In this training we have explained to staff what modern slavery is, its global impact, how it affects our business and how modern slavery concerns should be addressed. This reporting period we have had to dedicate time and resources to deal with other immediate consequences of COVID-19 on our business, which has resulted in less time and resources available in this reporting period to address modern slavery risks.
- However since the start of the pandemic, travel restrictions and difficulties due to COVID-19 have made it difficult to conduct our normal onsite supplier assessments. We intend on commencing our desktop assessments of major and at risk suppliers at the beginning of 2022, and our onsite supplier assessments as soon as it is possible to do so safely.

7.4 Looking ahead

- Harrison conducted a Board meeting in November 2021, with representatives from Harrison Group entities. An agenda item for this meeting was to discuss the Harrison Group's strategic approach to dealing with modern slavery. In this meeting we discussed our three-year strategy and our plan to further develop our strategic roadmap for identifying and combatting modern slavery risks.

7.4 Looking ahead cont...

Harrison Group is looking to formalise our priorities in relation to modern slavery and create a strategic roadmap to address modern slavery risks. We understand that we have in place a complex supply chain and as such we will be undertaking a prioritised approach to target our biggest modern slavery risks first. As part of this strategic roadmap and increasing our modern slavery compliance, we will plan our strategy moving forward, which may include:

- (a) identifying high risk suppliers and intermediaries in the supply chain and creating action plans to mitigate their modern slavery risks;
 - (b) formalising the roles and responsibilities of those representatives that will be involved in actioning our modern slavery roadmap;
 - (c) providing more detailed modern slavery training to our staff, to assist them with identifying potential modern slavery risks;
 - (d) developing and implementing ethical procurement clauses to include in supplier agreements (taking a risk based approach);
 - (e) implementing a supplier code of conduct which formally sets out our expectations;
 - (f) examining our onboarding process for suppliers, to identify high risk suppliers early on and mitigate any potential future modern slavery risks;
 - (g) adopting a group wide approach for key policies (developing and implementing an Anti-Human Trafficking and Modern Slavery Policy across all Harrison Group entities); and
 - (h) developing remediation strategies in line with the UN Guiding Principles on business and human rights, which offers grievance mechanisms (such as a modern slavery hotline).
- In addition, Harrison Group have a strategic meeting planned for February 2022, where we will further discuss and formalise our strategic roadmap, including to map out next steps for our modern slavery compliance journey.



MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of Clareville Pty Limited (ABN 42 003 038 668) as defined by the Modern Slavery Act 2018 (Cth) on 15th December 2021.

Signature of Responsible Member

This modern slavery statement is signed by a responsible member of Clareville Pty Limited (ABN 42 003 038 668) as defined by the Act:

Geoffrey Charles Harrison
Chairman, Clareville Pty Limited

Mandatory Criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory Criteria	Page number/s
a) Identify the reporting entity.	4
b) Describe the reporting entity's structure, operations and supply chains.	5-8
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	9-10
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	11-12
e) Describe how the reporting entity assesses the effectiveness of these actions	13
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	14
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant."	15-16

