

# Modern Slavery Statement FY2024

## Contents

<b>1</b>	<b>Introduction .....</b>	<b>1</b>
<b>2</b>	<b>Our structure, operations and supply chain .....</b>	<b>1</b>
2.1	Our structure .....	1
2.2	Our operations .....	1
2.3	Our supply chains .....	2
<b>3</b>	<b>Risks of modern slavery in our operations and supply chain .....</b>	<b>2</b>
3.1	Risk in our operations.....	2
3.2	Risk in our supply chain.....	3
<b>4</b>	<b>Action taken to assess and address modern slavery risks .....</b>	<b>4</b>
4.1	Supplier Due Diligence .....	5
4.2	Case Study: Tesla – a leading EV manufacturer.....	5
4.3	Other activities .....	7
<b>5</b>	<b>Effectiveness .....</b>	<b>8</b>
<b>6</b>	<b>Next steps .....</b>	<b>9</b>
<b>7</b>	<b>Consultation.....</b>	<b>9</b>
<b>8</b>	<b>Approval.....</b>	<b>9</b>
	<b>Appendix 1 Structure.....</b>	<b>11</b>
	<b>Appendix 2 Addressing the mandatory reporting criteria.....</b>	<b>12</b>

# 1 Introduction

This joint Statement is prepared and made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**) by FleetPartners Group Limited ABN 85 131 557 901 on behalf of itself and the following subsidiaries:

- Fleet Partners Pty Limited ABN 63 006 706 832
- Pacific Leasing Solutions (Australia) Pty Limited ABN 84 121 168 447
- Leasing Finance (Australia) Pty Ltd ABN 39 121 167 824
- Fleet Holding (Australia) Pty Ltd ABN 37 121 167 815

(together **FleetPartners, Group, we, our**) in respect of the financial year ended 30 September 2024 (**Reporting Period**).

FleetPartners remains committed to ethical business practices and respecting human rights in our operations and our supply chain.

This Statement has been approved by the Board of Directors of FleetPartners Group Limited on behalf of all reporting entities in the Group, as listed in section 8 (**Approval**) of this Statement.

## 2 Our structure, operations and supply chain

### 2.1 Our structure

FleetPartners Group Limited is incorporated in Australia and is listed on the Australian Stock Exchange (ASX:FPR) and is the parent entity of the Group. The controlled entities of the Group listed in Appendix 1 were wholly owned during the Reporting Period, unless otherwise stated.

The Group's head office is in St Leonards, New South Wales and we have presence in Melbourne, Brisbane and New Zealand. Some of our workforce work remotely in Australia on a permanent basis.

The Group's annual consolidated revenue in the financial year ending 30 September 2024 was \$761,632,000.

### 2.2 Our operations

FleetPartners provides vehicle leasing (by way of operating and finance leases) and fleet management services in Australia and New Zealand. In Australia, we also provide novated leasing and salary packaging benefits. FleetPartners manages over 84,000 vehicles on behalf of customers.

We have approximately 465 employees in both Australia and New Zealand, the majority of whom perform office based functions and all of whom are aged over 18 years. A small number of employees perform on-site audits and inspections of vehicle-related matters of certain Australian-based suppliers.

During the Reporting Period, we progressed the consolidation of distinct business units that had operated under standalone brands (FleetPlus and FleetChoice) under FleetPartners. All business units report into shared operational and management teams. This includes corporate functions such as procurement, finance and human resources.

## 2.3 Our supply chains

The main suppliers in our supply chain can be broadly classified into two categories: corporate support and vehicle lease lifecycle.

During the term of a vehicle lease we arrange for vehicle in-life services to be provided and at lease end, we arrange for the vehicle to be re-marketed. A considerable number of our vehicle dealerships or certain suppliers that provide vehicle related services are chosen by our customers.

The categories of suppliers in our supply chains continue largely unchanged from the previous reporting period.

An overview of some of the categories of suppliers in our supply chain is below:

Corporate support	Vehicle lease lifecycle <sup>^</sup>
Finance	Vehicle manufacturers
Professional services (e.g consultancy, legal services, accounting, advisory, creative)	Vehicle dealerships and maintenance
Commercial property (owners and managing agents)	Tyre suppliers
Office cleaners	Fuel and vehicle energy suppliers
Technology services and products	Registration, tollways, roadside and breakdown assistance
Travel and accommodation	After-market vehicle accessories and products
Office Supplies	Vehicle transport
Utilities	Rental cars and accident management services
Catering	Motor vehicle insurance
	Vehicle disposal agents and auction houses

<sup>^</sup>Certain suppliers in the vehicle lease lifecycle category may be selected by our customers.

These entities are primarily based in Australia and New Zealand. Some IT software and services are procured from suppliers located in Singapore, India and the USA.

In order to identity the risk of modern slavery in our supply chain, we sought responses from a number of our suppliers to a modern slavery questionnaire (MSQ) as detailed in section 4.1. The majority of the suppliers that completed the MSQ submitted that they are located or registered in either Australia or New Zealand.

## 3 Risks of modern slavery in our operations and supply chain

### 3.1 Risk in our operations

The Global Slavery Index 2023 estimates that on any given day in 2021 there were approximately 41,000 individuals living in modern slavery in Australia<sup>1</sup> and 8,000 in New

<sup>1</sup> Walk Free 2023, Global Slavery Index 2023, Minderoo Foundation. Available from: <https://www.walkfree.org/global-slavery-index/country-studies/australia/>.

Zealand<sup>2</sup>. On a scale of 0 to 100, with 100 being the highest vulnerability to modern slavery, Australia is rated as 7 and New Zealand is rated as 8, both resulting in below average vulnerability for the region.

Accordingly, as our operations are based in Australia and New Zealand, we consider that the geographic risk of modern slavery in our operations remains low.

The low geographic risk, combined with our employment and recruitment practices and our workforce profile, reduces the risk of our business causing or contributing to adverse human rights impacts, including modern slavery in our operations. Our employment and recruitment practices include policies, systems and procedures designed to address ethical employment practices, human rights, and our employee's rights to a flexible and safe workplace and appropriate remuneration. The policies cover topics such as:

- Diversity, Equity and Inclusion
- Remuneration
- Family and Domestic Violence
- Creating a Respectful Workplace
- Work Health, Safety and Wellbeing

We conduct our operations in accordance with our Code of Conduct. Our policies, systems and procedures aim to ensure we remain compliant with relevant legislative requirements.

We transparently manage the remuneration of our employees in a fair and equitable manner, reflecting the responsibilities of each role, alignment with local market conditions and legislative requirements.

We conduct an annual gender pay review to identify and help mitigate gender pay disparities. During the Reporting Period we published our Australian Gender Pay Gap Statement as required by the Workplace Gender Equality Agency (**WGEA**), reaffirming our commitment to promoting gender equality across the organisation.

FleetPartners maintained our status as a WGEA Employer of Choice for Gender Equality. In February 2024, Work180 placed FleetPartners in the 'Top 5 Australian companies' for offering comprehensive paid time off policies aimed at achieving an enhanced work-life balance, improved health benefits, reduced stress levels and increased trust and engagement.

We provide all employees access to an external employee assistance program which offers a range of support services including workplace issues, critical incidents, diversity and inclusion, family and healthy relationships, health and wellbeing.

### 3.2 Risk in our supply chain

Based on our direct procurement categories, location of direct suppliers and our risk assessment results from the MSQ process, we consider that the risk of having caused or

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<sup>2</sup> Walk Free 2023, Global Slavery Index 2023, Minderoo Foundation. Available from: <https://www.walkfree.org/global-slavery-index/country-studies/new-zealand/#:~:text=in%20the%20region,-,Prevalence,modern%20slavery%20in%20New%20Zealand.>

contributed to adverse human rights impacts, including modern slavery, in our supply chain remains low.

However, we recognise that the supply chains of our direct suppliers are likely to include suppliers (both direct and indirect) from countries where modern slavery practices such as forced labour, debt bondage and the worst forms of child labour are more prevalent. Suppliers in the manufacturing sector are exposed to modern slavery risks as a result of complex supply chains that are reliant on raw materials sourced or processed from higher risk countries (for example, critical minerals for electric vehicle batteries or smartphones, information technology infrastructure manufacturers, and natural rubber used in tyres). We are also aware of reports of modern slavery in the automotive manufacturing sector<sup>3</sup> in general, as well as in electric battery manufacturing within the electric vehicle (EV) industry:

*“Electric battery manufacturing entails significant modern slavery risks, from the extraction of raw minerals to the manufacturing process. The fast-growing EV industry is not effectively responding to the heightened level of risks: despite most (94 per cent) of the 18 EV manufacturers assessed having whistleblower mechanisms in place, only one company identified incidents of forced labour in their supply chains. Our research also reveals that EV companies’ remediation strategies do not include worker remediation and relies instead on cancelling contracts (39 per cent) and corrective action plans (50 per cent)”<sup>4</sup>.*

Furthermore, suppliers of services reliant on base-skilled workers which have low barriers to entry have increased exposure to causing, contributing to or being linked to modern slavery, such as forced labour and debt bondage, irrespective of the jurisdiction risk profile. For example, cleaning services, labour hire, and roles with temporary staffing and recruitment are sectors which are more vulnerable to modern slavery even in low-risk jurisdictions such as Australia and New Zealand.

Consistent with the Group’s assessment of its own modern slavery risk, the risk mapping and due diligence procedures, we consider the majority of our key direct suppliers<sup>5</sup> as having a lower risk of modern slavery within their operations. Greater risk exists within their respective supply chains as described above.

## 4 Action taken to assess and address modern slavery risks

During the Reporting Period, we focused on embedding measures previously introduced and undertook a case study of an EV manufacturer.

<sup>3</sup> Driving Force – Automotive Supply Chains and Forced Labor in the Uyghur Region (shufordlabour.org) – last updated in 2022.

<sup>4</sup> Walk Free Foundation. Available at <https://cdn.walkfree.org/content/uploads/2024/10/22101407/WF-Beyond-Compliance-Electronics-Sector.pdf>.

<sup>5</sup> In our FY23 Modern Slavery Statement we outlined the parameters used to identify our ‘key direct suppliers’ which broadly included: suppliers assessed in previous reporting periods as posing a medium or high modern slavery risk regardless of other criteria or spend threshold; certain targeted industries; and strategic importance or materiality to our operations (e.g. ICT, financial services, professional services and certain heavy commercial vehicle suppliers/maintenance providers).

## 4.1 Supplier Due Diligence

We continued to use the Ethixbase360 platform to assess the risk of modern slavery in our supply chain through the MSQ developed by Ethixbase360 in conjunction with international law firm Norton Rose Fulbright.

During this Reporting Period the approach for issuing an MSQ was as follows:

- suppliers screened in FY23 were re-screened if the supplier's risk rating was previously assessed as medium or high in the previous MSQ or if the supplier failed to complete the previously issued MSQ; and
- for vehicle related suppliers, we reviewed our FY23 spend in order to determine materiality. We selected suppliers to receive an MSQ if we spent equal to or greater than \$100,000 with that supplier. Further, if within that cohort, suppliers were identified as being owned by a common parent who we have a relationship with, only the parent entity was assessed on behalf of its subsidiaries. This equated to 89.6% of suppliers by spend.

As was the case in previous reporting periods, some of our suppliers in the vehicle manufacture, IT and finance sectors declined to complete the questionnaire, preferring instead to submit their own modern slavery statements for our review. Additionally, some suppliers did not respond. Despite this, we will continue to request completion of our MSQ as in accordance with our program of activities.

## 4.2 Case Study: Tesla – a leading EV manufacturer

In this Reporting Period, we have undertaken a case study of Tesla, Inc. (**Tesla**), a manufacturer of EVs, energy generation and storage systems. Our EV supplier is Tesla Motors Australia Pty Ltd (**Tesla Australia**), but for the purposes of the case study we have referred to Tesla more broadly as the manufacturer of EVs.

Our previous assessment of Tesla's modern slavery risk identified its disclosure of the possibility of modern slavery in its supply chain related to its sub-suppliers.

The aim of conducting the study was to assess Tesla Australia's disclosures in relation to these issues and what actions may have been taken by the manufacturer to remediate any modern slavery impacts in its supply chain.

Online reports published by *The Washington Post* and *The Guardian* assessed Tesla as having a higher risk of modern slavery due to reports that its supply chain and use of raw materials were connected to the Xinjiang Uyghur Autonomous Region of China (also known as XUAR)<sup>6</sup>.

According to Sheffield Hallam University research contained in *Driving Force – Automotive Supply Chains and Forced Labour in the Uyghur Region* EV batteries require lithium, nickel, cobalt, graphite and manganese. China processes 60% of the world's lithium, with a growing

<sup>6</sup> <https://www.washingtonpost.com/business/interactive/2023/electric-vehicles-forced-labor-china/> and <https://www.theguardian.com/world/2022/jan/04/tesla-criticised-for-opening-showroom-in-xinjiang-despite-human-rights-abuses>.

percentage of that refining underway in XUAR<sup>7</sup>. Automotive supply chains are complex and can involve many thousands of suppliers at various tiers of a supply chain. Risks are obscured by the large number of manufacturers required for raw material inputs and sub-assemblies<sup>8</sup>.

We are aware that the Bureau of International Labor Affairs (**ILAB**) identified electrolytic copper products and lithium-ion batteries produced in China are made with an input produced with child labour, specifically copper ore produced in the Democratic Republic of Congo. Electrolytic copper and copper alloys are used to produce lithium-ion batteries in China. This research suggests that further downstream products of copper ore, such as electric vehicles, electrical equipment, electrical wiring, brass, steel, telecommunications products and construction materials, may be produced with an input of child labour<sup>9</sup>.

In 2022, the Australian Foreign Minister, Penny Wong, published a statement<sup>10</sup> expressing concern about the finding of the Office of the High Commissioner for Human Rights' report on Xinjiang which concluded that serious human rights violations have been committed in Xinjiang.

The 2023 article published by The Washington Post cited that Chinese companies supply nearly 40 percent of the materials for batteries that go into Tesla vehicles worldwide, according to Nikkei Asia, a financial newspaper that scrutinised more than 13,000 companies in the Tesla supply chain<sup>11</sup>.

Human Rights Watch has reported that Tesla has direct affiliations with suppliers who use aluminum ingots sourced from the Xinjiang region of China<sup>12</sup>. The problematic nature of the Xinjiang region being associated with forced labour and crimes against humanity relating to the Uyghur population is a cause for concern. Tesla's supply chain being traced back to XUAR has been raised by multiple sources as a considerable issue. Tesla also uses the Aluminum Stewardship Initiative (**ASI**) as a method to certify direct suppliers' performance standards and potential use of responsible sourcing and human rights due diligence practices. Further confirmation emanates that the ASI audit reports note the auditors do not satisfactorily evaluate efforts by participating companies to prevent or mitigate forced labour within their supply chains.

Tesla identified the following inputs to its products as a risk for modern slavery and child labour in supply chains: gold, mica, silica and cobalt<sup>13</sup>. Its published action plan is to mitigate risks by partnering with bodies who commit to continuous improvement relating to the practices associated with these materials. Further, issues were flagged with the interiors,

<sup>7</sup> Murphy, Laura, Salcito, Kendyl, Uluyol, Yalkun and Rabkin, Mia (2024). *Driving force: automotive supply chains and forced labour in the Uyghur region*. Project Report. Sheffield Hallam University, Helena Kennedy Centre for International Justice. Referenced under Creative Commons Attribution 4.0 License and available at <https://shura.shu.ac.uk/id/eprint/34918>.

<sup>8</sup> As above.

<sup>9</sup> <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods-print>.

<sup>10</sup> <https://www.foreignminister.gov.au/minister/penny-wong/media-release/human-rights-concerns-xinjiang>.

<sup>11</sup> <https://www.washingtonpost.com/business/interactive/2023/electric-vehicles-forced-labor-china/>.

<sup>12</sup> <https://www.hrw.org/report/2024/02/01/asleep-wheel/car-companies-complicity-forced-labor-china>.

<sup>13</sup> Goods identified by the Bureau of International Labour Affairs that may be produced by child or forced labour in certain countries. <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods-print>.



interior accessories, batteries and aluminum contained in their vehicles, each of which Tesla states has since been rectified via greater supplier accountability.

Tesla Australia declined to complete our MSQ and opted instead to provide Tesla's 2023 Modern Slavery Statement (made under the Act) for our assessment (**Tesla MSS**). As part of the case study, we also reviewed Tesla's 2022 Modern Slavery Statement.

From our review of the Tesla MSS, we have noted that Tesla has identified the potential for forced labour, modern slavery, child labour and young workers as salient human rights and salient responsible sourcing risks. Tesla states that it is committed to ensuring its supply chain, from raw materials to final products, is free of forced labour or human trafficking in any form. Tesla further states that 'if appropriate' it may disengage with a supplier and not re-engage until evidence of remediation is provided and the supplier has strengthened its management systems to prevent future violations. It is unclear what 'if appropriate' means in this context.

Tesla states in its 2022 Modern Slavery Statement that in 2022 it began piloting a supplier self-assessment questionnaire (**SAQ**) with 52 suppliers that requires entities to affirm they have the policies, processes and controls in place at the manufacturing site level, including in relation to labour, health and safety and supply chain responsibility. Tesla has reported that in 2023 it launched its SAQ to nearly 1,000 supplier sites.

From the Tesla MSS, we conclude that it has taken positive steps towards more responsible sourcing including reviewing grievances made from NGOs and academic studies. It has also started to engage directly with suppliers in relation to risks identified and best practices, along with supplier specific action plans. We will continue to monitor its progress and would like it to enhance its efforts to understand and manage modern slavery risks beyond its direct suppliers.

## 4.3 Other activities

### Training

We have continued to deliver the current Modern Slavery training to our employees in Australia as well as a target group of employees in New Zealand.

Employees within the Group, including those employed in our subsidiaries, are required to complete comprehensive compliance training in relation to, among other regulatory obligations, identifying modern slavery and human trafficking risks. Existing employees are required to renew their compliance training biennially.

### Modern Slavery Policy

We reviewed the overall effectiveness of the approach outlined in our Modern Slavery Policy. As a result, the Board endorsed an updated Modern Slavery Policy, reflecting the maturing modern slavery risk assessment and due diligence activities within the Group. The Modern Slavery Policy is published on our FleetPartners intranet.

During the Reporting Period, no reports of actual or suspected modern slavery were made to the Modern Slavery Policy Officer.

### Whistleblower Policy

Our Whistleblower Policy, which applies in both Australia and New Zealand, encourages the reporting of any conduct or activities relating to human rights or modern slavery issues as being matters that may be reported under this Policy.

The Modern Slavery Policy, as well as the Whistleblower Policy, make it clear that anyone who reports concerns will not be subjected to retaliation for reporting such risks.

During the Reporting Period, no reports of actual or suspected modern slavery were made to the Modern Slavery Policy Officer or via our whistleblowing channels.

### Supplier Code of Conduct

Our Supplier Code of Conduct (**Supplier Code**) remained in place and is published on our website. The Supplier Code articulates our minimum expectations of suppliers providing goods and services to FleetPartners in both Australia and New Zealand that we expect our suppliers to meet or exceed. The Supplier Code includes an expectation that suppliers create a safe working environment for their workers and do not permit any form of forced, bonded or indentured labour.

All suppliers that responded to our MSQ have either agreed to comply with our Supplier Code or comply with their own comparable code.

### Supplier Agreements

We have included undertakings to adhere to the Supplier Code and contractual obligations not to cause or contribute to modern slavery in our standard supplier agreements. Our standard supplier agreements also include contractual obligations to comply with relevant laws, including human rights laws.

## 5 Effectiveness

We remain committed to evaluating the effectiveness of our actions, adapting and strengthening our approach as necessary. Our assessment of our effectiveness in FY24 included review of our achievement of the actions described in the “Next steps” section in our FY23 Statement. The results of our effectiveness assessment, which included the review of our Modern Slavery Policy and recommended amendments, were provided to and endorsed by the Board. In FY25, we will similarly track our achievement of the action plan outlined under section 6 (**Next steps**). We also plan to further develop our effectiveness assessment methodology during FY25.

We will continue to monitor the Group’s compliance with the policies and procedures as set out in this Statement and update the Board on any emerging risks or modern slavery-related concerns identified during the next reporting period.

## 6 Next steps

Our action plan for the next reporting period is to consolidate our current program and:

- survey a selection of our operating lease customers to ascertain the extent to which human rights or modern slavery concerns impact vehicle make and model selection;
- enhance our effectiveness assessment;
- continue to use the results from our MSQ to engage with those suppliers identified as having a higher risk of modern slavery and to the extent possible, use our leverage<sup>14</sup> to mitigate any adverse human rights impacts with those suppliers; and
- continue to require suppliers to adhere to the Group's Supplier Code of Conduct.

## 7 Consultation

FleetPartners operates a shared services model, and has centralised human resources, vehicle lifecycle procurement/purchasing, IT, finance, risk and legal functions within the Group, including its subsidiaries.

Accordingly, there is one management team responsible for coordinating the Group's approach to assessing and addressing the modern slavery risks within the Group and within its supply chain (as explained above) for preparing this Statement. This process constituted the consultation process with the entities owned or controlled by FleetPartners in the development of this Statement.

## 8 Approval

This Statement is made pursuant to section 14(1) of the Act and constitutes the Modern Slavery Statement for the Reporting Period ending 30 September 2024 for FleetPartners Group Limited, as a Joint Statement, inclusive of the relevant related companies of FleetPartners Group Limited to which the Act applies.

In Australia, these related companies are

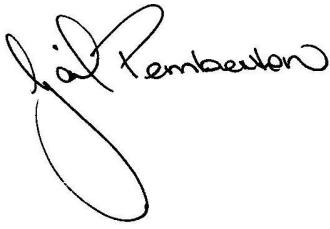
- Fleet Partners Pty Limited;
- Pacific Leasing Solutions (Australia) Pty Limited;
- Leasing Finance (Australia) Pty Ltd; and
- Fleet Holding (Australia) Pty Ltd.

FleetPartners Group Limited, as the ultimate holding company and higher entity of these companies, is in a position to control each reporting entity covered by this Statement.

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<sup>14</sup> **Leverage** is considered to exist where the enterprise has the ability to effect change in the wrongful practices of an entity that causes harm (United Nations Guiding Principles on Business and Human Rights 2011).

This Statement has been approved by the Board of FleetPartners Group Limited on 20 March 2025 and signed by Gail Pemberton AO, Chair and Damien Berrell, Chief Executive Officer and Managing Director.



**Gail Pemberton AO**  
Chair



**Damien Berrell**  
Chief Executive Officer and Managing Director

## Appendix 1 Structure

The following controlled entities of FleetPartners Group Limited were wholly owned during the Reporting Period, unless otherwise stated.

### Australia

Fleet Aust Subco Pty Ltd	Pacific Leasing Solutions (Australia) Pty Ltd
PLS Notes (Australia) Pty Ltd	Leasing Finance (Australia) Pty Ltd
Fleet Holding (Australia) Pty Ltd	Fleet Partners Franchising Pty Ltd
Fleet Partners Pty Ltd	Eclipx Insurance Pty Ltd
Car Insurance Pty Ltd	CarInsurance.com.au Pty Ltd
FleetPlus Holdings Pty Limited	FleetPlus Pty Ltd
FleetPlus Novated Pty Ltd	PackagePlus Australia Pty Ltd
Fleet Choice Pty Ltd	Accident Services Pty Ltd
Leasing Finance Services Pty Ltd	Equipment Finance Holdings Pty Ltd
FP Turbo Series 2021-1 Trust (terminated on 24 June 2024)	FP Turbo Series 2019-1 Trust (terminated on 19 January 2023)
FP Turbo Warehouse Trust 2021-1	FP Turbo EV Warehouse Trust 2021-1
FP Turbo Series 2024-1 Trust	FP Turbo Series 2023-1 Trust

### New Zealand

FleetPlus Ltd	FleetPartners NZ Trustee Ltd
FleetPartners NZ Limited	Truck Leasing Ltd
Fleet NZ Limited	FP Ignition Trust 2011-1 New Zealand
Pacific Leasing Solutions (NZ) Limited	FPNZ Warehouse Trust 2015-1 (terminated on 21 August 2024)
Leasing Finance (NZ) Limited	PLS Notes (NZ) Ltd
FleetPartners Holding (NZ) Limited	

## Appendix 2 Addressing the mandatory reporting criteria

Mandatory Criteria	Section in Statement	Page
1. Identify the reporting entity	Section 1	1
2. Describe the reporting entity's structure, operations and supply chains	Section 2	1
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that it owns or controls	Section 3	2
4. Describe the actions taken by the reporting entity and any entity that it owns or controls, to assess and address these risks, including due diligence and remediation processes	Section 4	4
5. Describe how the reporting entity assesses the effectiveness of these actions	Section 5 and 6	8
6. Describe the process of consultation with any entities that the reporting entity owns or controls	Section 7	9
7. Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Sections 4.3	9