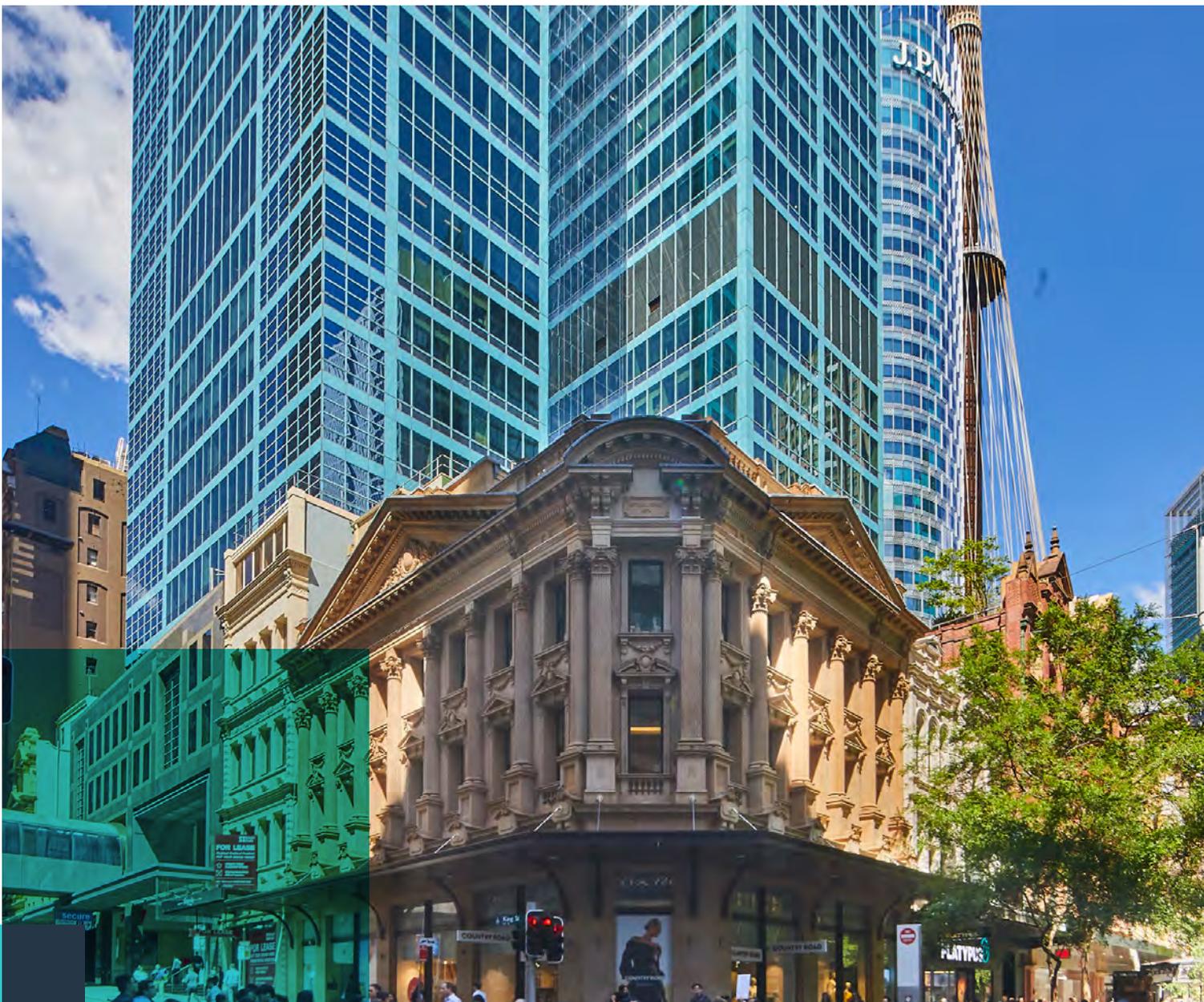


Investa Modern Slavery Statement

November 2021

Prepared by Investa



Contents

| | |
|---|----|
| About This Statement | 4 |
| CEO Message | 6 |
| Our Structure, Operations and Supply Chain | 8 |
| Understanding and Assessing Our Modern Slavery Risks | 12 |
| Addressing and Managing Our Modern Slavery Risks | 18 |
| Governance and Policy Frameworks | 20 |
| Supplier Engagement | 22 |
| Remediation Processes | 23 |
| Education | 23 |
| Assessing Effectiveness | 25 |
| Consultation | 25 |
| Our Next Steps | 26 |
| Approval and Signature | 27 |
| Appendix One: Alignment with Modern Slavery Act Criteria | 28 |

About This Statement

This is Investa's second Modern Slavery Statement (Statement) to address the requirements of the Australian *Modern Slavery Act 2018* (Cth) (Act). The reporting period covered by this Statement is 1 July 2020 to 30 June 2021.

Investa Office Management Holdings Pty Limited and its subsidiaries (together, Investa) is a specialist manager of real estate in Australia, operating an integrated end-to-end management platform incorporating funds management, asset management, property and facilities management services.

The policies, processes and actions described in the 2021 Statement apply across Investa's corporate structure.

OPG Office Fund Holdings I Trust, OPG Office Fund Holdings II Trust, and OPG Office Fund Holdings III Trust (together, Oxford Investa Property Partner) were assessed to be reporting entities for the purpose of our Modern Slavery Statement 2020, however, these entities have not met the consolidated revenue threshold for the FY2021 reporting period.

This Statement is made by Investa Commercial Property Fund (ICPF) as a reporting entity.

In addition, Investa Office Management Holdings Pty Ltd (IOMHL) is reporting on a voluntary basis. Although reporting voluntarily, the Board of IOMHL has approved this Statement since IOMHL is the head entity of the Investa management platform that has responsibility for the management of the properties, operations and developments on behalf of the Investa funds, and since the management platform operates under the same policies and shares the commitment to responsible business practices.

Acknowledgement of Country

Investa acknowledges the Traditional Owners of the land on which our business operates and where we come together to work. We acknowledge the continuing connection to land, waterways and culture. We pay our respects to Elders past, present and emerging.



Chief Executive Officer's Message

This is Investa's second Modern Slavery Statement outlining our progress in identifying and addressing the risk of modern slavery in our operations and supply chains.

Our vision is to create Australia's most valued workplaces and communities and we understand that our investments, operations and developments may have an impact (both positive and negative) on a range of stakeholders in and supporting our assets and investments. We are committed to the United Nations Guiding Principles (UNPGs) on Business and Human Rights and to embedding respect for human rights into our risk management and operational practices; and supporting our employees, customers, and suppliers, as well as the communities in which we operate.

FY21 and the ongoing impacts of COVID-19 further highlighted the importance of, and the vulnerability of many workers in, our supply chain. Front-line workers in security and

cleaning continued to keep our buildings and customers safe. Our construction workforce continued to work through a myriad of disruptions to bring our buildings to life, supporting our workplaces and communities of the future.

Investa recognises all businesses may be exposed to modern slavery practices in their operations and supply chains. Our responsible investment approach aligns with our values that seek to "Do it better" where we set the bar higher every time; and "Do the right thing" where we are open and ethical in our dealings.

During the reporting period, we built on our strong foundations of progressing diversity, inclusion and human rights. During FY21 we adopted our Human Rights Policy and refined and formalised the role of our Human Rights and Modern Slavery Working Group and framework to guide our approach. We engaged with our employees on the possible impacts of modern slavery and human rights violations, focusing on our supply chains where we see the most significant risks, and provided them an understanding of modern

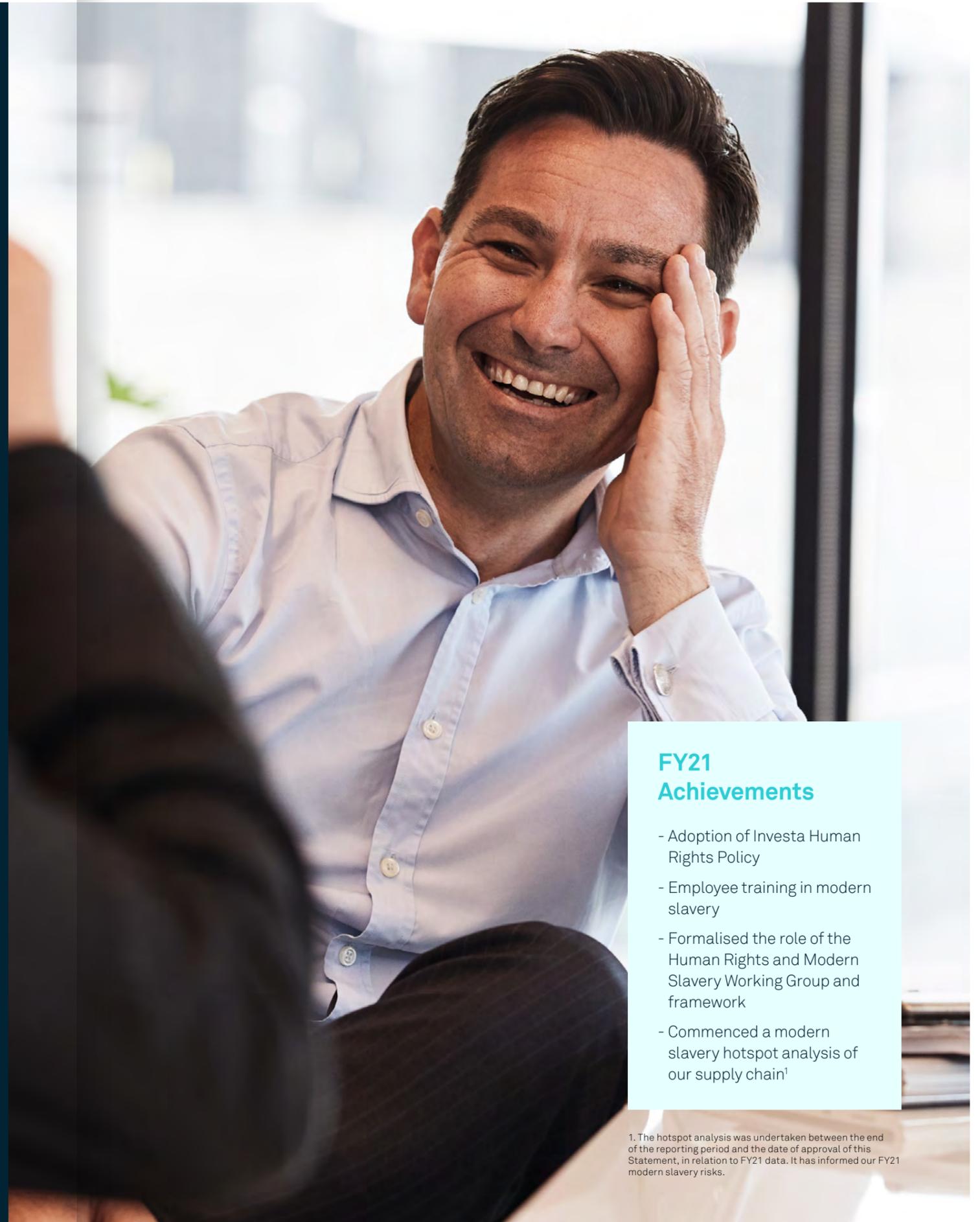
slavery and how it applies to them in their workplace and operations. We also undertook a hotspot analysis in relation to the reporting period to further understand the modern slavery risks in our supply chain, which will inform our future practices.

We continue to collaborate with our industry and peers to address modern slavery in what are often common supply chains. Our ongoing engagement with a number of our suppliers has led to a better understanding of their approaches in addressing their modern slavery risks and how we can work with them to build their knowledge, practices and mitigate these risks.

We are committed to continual improvement and will focus our efforts towards building on our governance processes, undertaking a deeper dive with key higher-risk suppliers, developing our remediation processes and building on our employee knowledge and risk management practices in relation to modern slavery.



Peter Menegazzo
Chief Executive Officer,
Investa



FY21 Achievements

- Adoption of Investa Human Rights Policy
- Employee training in modern slavery
- Formalised the role of the Human Rights and Modern Slavery Working Group and framework
- Commenced a modern slavery hotspot analysis of our supply chain¹

1. The hotspot analysis was undertaken between the end of the reporting period and the date of approval of this Statement, in relation to FY21 data. It has informed our FY21 modern slavery risks.

Our Structure, Operations and Supply Chain

Our Funds and Entities

Our high-performing funds provide institutional investors at home and offshore with real estate investment opportunities in Australia.



The funds and entities include:
 Investa Property Group (IPG) is a Stapled Security comprised of ICPF Holdings Ltd and Investa Commercial Property (ICPF) Fund.

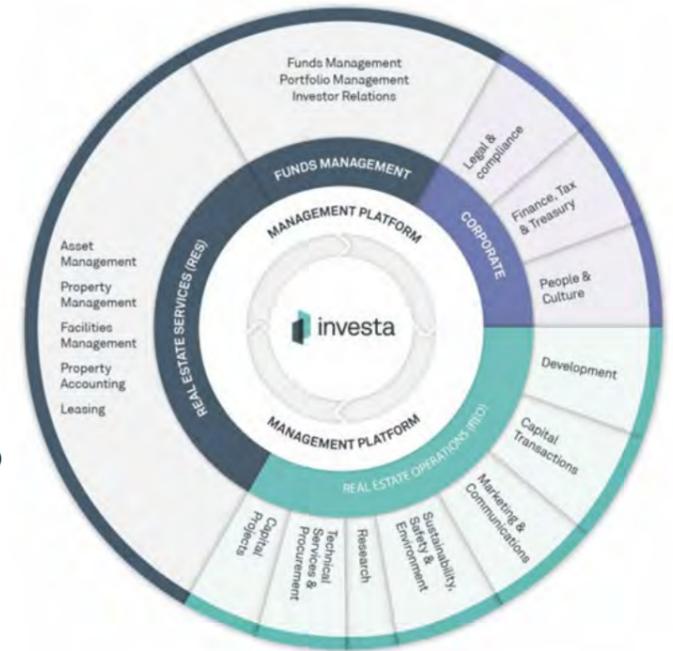
Investa Wholesale Funds Management Limited (IWFML) is the responsible entity of Investa Commercial Property Fund.

Oxford Investa Property Partnership (OIPP) is the owner of a portfolio of high quality commercial office assets managed by Investa.

Investa manages properties, operations and developments on behalf of the clients of the Investa management platform.

Our Operations What We Do

As one of Australia’s highly recognised real estate companies, Investa’s vision is to create Australia’s most valued workplaces and communities.



Our integrated management approach means we have an end-to-end platform that can look after buildings from acquisition stage, through to day-to-day operations and financial management.

Our approach, including in relation to modern slavery, aligns with our values, which are:

- ✓ Believe in each other
- ✓ Do it better
- ✓ Do the right thing
- ✓ Embrace change
- ✓ Go above & beyond

Our broad range of capabilities combines strategic, operational, environmental and technological services and solutions. But more than that, we’re spearheading leadership in sustainable property management and ownership.

We have deep knowledge and experience within Australian real estate markets – all underpinned by specialist, in-house research capabilities.

Funds Management

Our high-performing funds, based in Australia, provide institutional and retail investors at home and offshore with real estate investment opportunities across Australia’s office sector. Our funds have just over \$11billion in assets under management.

Real Estate Services

We provide direct asset, property and facilities management for our buildings and tenants, in Australia. Our real estate services focus on customer service, tenant retention, leasing strategy and operational and financial performance. As well as supporting services such as property accounting and lease administration.

Real Estate Operations

Our real estate management platform optimises the performance and returns of our assets, as well as the services we provide to our tenants, with consistent reporting, standards and processes. Our platform, operating solely in Australia, provides:

- research
- innovation and data analytics
- procurement of services and products
- project management
- capital transactions
- marketing, communications and tenant engagement
- facilities & technical services
- sustainability
- safety and environment

Our management platform procures a range of services to support our building operations, such as property maintenance, cleaning, security, waste services, financial management and professional services.

Development Services

Our development management services support our build to core funds and mandates strategies. These services deliver high performing and sustainable buildings that meet the needs of our tenant customers now and into the future.



Investa develops and manages real estate assets on behalf of our funds, mandates and partnerships. Our customers in our office buildings are governed by Australian workplace law and are generally office-based firms.

We are also currently developing Build to Rent assets which will provide an alternative to the private rental market for residents.



219

Team members across Australia



25

Prime office buildings



\$11.9BN

assets under management



581

Office and retail Tenants / occupants



2

Funds

Our Supply Chains

Investa procures a range of services and products to support our business operations and developments.

Funds Management Supply Chain

Services that support funds management including:

- Financial and accounting services
- Professional services

Construction Supply Chain

Principal contractor responsible for procurement of:

- Sub-contractors and labour force to support various construction skills
- Building materials (such as concrete, steel, glass, etc)
- Professional design, engineering and construction services

Operations Supply Chain

Services that support building operations including:

- Cleaning services
- Security services
- Waste services
- Property maintenance services and materials
- Building operations services such as lift and building management systems
- Financial and accounting services
- Professional services

Corporate Supply Chain

Products and services that support corporate business operations including:

- ICT Equipment (such as computers and telephones)
- Office furniture
- Office supplies / consumables
- Merchandise, apparel and PPE
- Advertising services
- Financial and accounting services
- Professional services



Understanding and Assessing Our Modern Slavery Risks

How We Assess Modern Slavery Risks in Our Operations and Supply Chain

We understand that modern slavery risks may be present in the operations and supply chains of companies operating in the real estate sector, including Investa.

This section of our statement describes our potential modern slavery risk areas and the steps we have taken to identify and assess these risks.

We have undertaken a number of steps to assess our potential modern slavery risks, including undertaking a risk assessment of our operations and supply chain in 2019. This risk assessment was undertaken by a third party and is described in our *2020 Statement*.

Importantly, this initial assessment indicated there was a low risk of modern slavery occurring in our operations. This reflects the nature of our workforce, which is based in Australia, primarily employed in office-based environments and engaged in accordance with Australian workplace law. Our policy and governance framework also helps ensure we provide a safe and fair working environment. While we recognise that modern slavery can occur in Australia, we continue to consider that there is minimal risk of modern slavery occurring in our direct operations.

As indicated by the 2020 assessment, we recognise that our modern slavery risks are likely to be concentrated in our supply chain. We have worked to strengthen our understanding of potential risk areas in our supply chain and built on our 2019 risk assessment by completing a modern slavery hotspot analysis of our supply chain (hotspot analysis).

This hotspot analysis was undertaken by an expert business and human rights advisory firm, and identified 13 potential modern slavery 'hotspots' across our supply chain, including both our capital and operational expenditure. This assessment was informed by analysis of our supplier spend, engagement with our procurement team and reference to key external resources, including the *Global Slavery Index*, *Responsible Sourcing Tool* and information, guidance and reports produced by the Australian and other relevant Governments.

In addition to these risk assessment processes, we also continued our engagement with the Property Council of Australia's Modern Slavery initiative which includes an annual supplier pre-qualification assessment process. Further information about this work is set out on pages 20 and 22.



What are 'modern slavery risks'?

As defined in the Australian Government's *official guidance material* about the Act, we understand 'modern slavery risks' to mean the potential for our business to cause, contribute or be directly linked to modern slavery through our operations and supply chain.

This definition aligns with the continuum of involvement for human rights harm set out in the UNGPs, which we use to guide our modern slavery risk management approach. The UNGPs are the authoritative global standard for how businesses should manage adverse human rights impacts, such as modern slavery.

Our Human Rights Policy highlights our commitment to aligning our modern slavery risk assessment activities and broader work to manage modern slavery risks with the UNGPs:

"The UNGPs guide the implementation of our policy commitments, including embedding the identification and management of modern slavery risks in our existing due diligence and procurement processes, assessing actual and potential human rights impacts, responses to findings, and communication of remedies."

- Investa Human Rights Policy 2021

Our Modern Slavery Risks

While we consider the risk of modern slavery occurring through our direct operations is low, we recognise that our modern slavery risks are likely to be concentrated in our supply chain.

The hotspot analysis outlines the 13 areas of our supply chain where we have identified that there may be a higher risk of modern slavery. This includes seven hotspots related to the procurement of products and six hotspots relating to the procurement of services.

In line with the UNGPs, we consider there is a risk we may be 'directly linked' to modern slavery in each of these hotspots. This means there is a risk we may be connected to modern slavery through the activities of another entity (such as a sub-supplier) who is involved in providing products or services to us. For example, there is a risk we may be directly linked to modern slavery if our principal contractor procures construction materials such as steel for use in the construction of our property assets which have been manufactured using modern slavery. We also recognise that in some circumstances there could be a risk we might contribute to modern slavery if we engaged with our suppliers in a way that might incentivise or facilitate modern slavery.



Our Modern Slavery Hotspots

Modern Slavery Risk Factors

The modern slavery hotspots we have identified involve a range of modern slavery risk factors, which may include:

- reliance on migrant workers
- use of low-skilled labour
- fast moving and complex supply chains
- strong pricing competition (particularly where employee costs are the primary cost of doing business)
- sourcing of raw materials by suppliers from high risk geographies
- suppliers' manufacturing activities taking place in low cost countries with poor workplace protections



Office furniture



Domestic travel and accommodation



Office supplies and consumables



ICT equipment



Cleaning services



Security services



Other low skilled service providers, e.g. handyman



Higher skilled service providers, e.g. Electrical/ pest control



Development spend: Construction labour



Development spend: Construction materials (including logistics)



Apparel and PPE

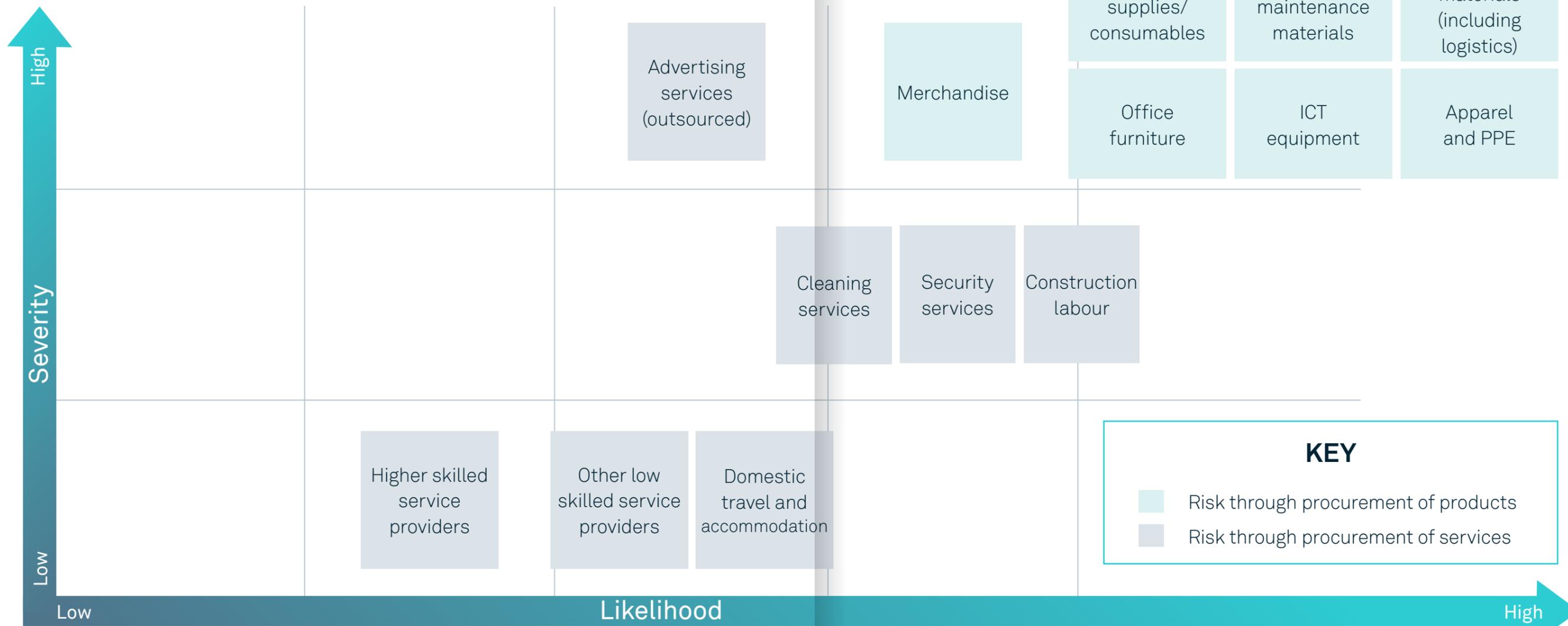


Outsourced advertising services and merchandise



Property maintenance materials

Indicative severity and likelihood of modern slavery hotspots



Our hotspot analysis² assessed the indicative severity and likelihood of each hotspot. In line with the UNGPs, severity was assessed by considering:

- Scale - the gravity of the impact on relevant human rights
- Scope - how many people would be affected
- Irremediability - whether the impact could be restored to the prior state.

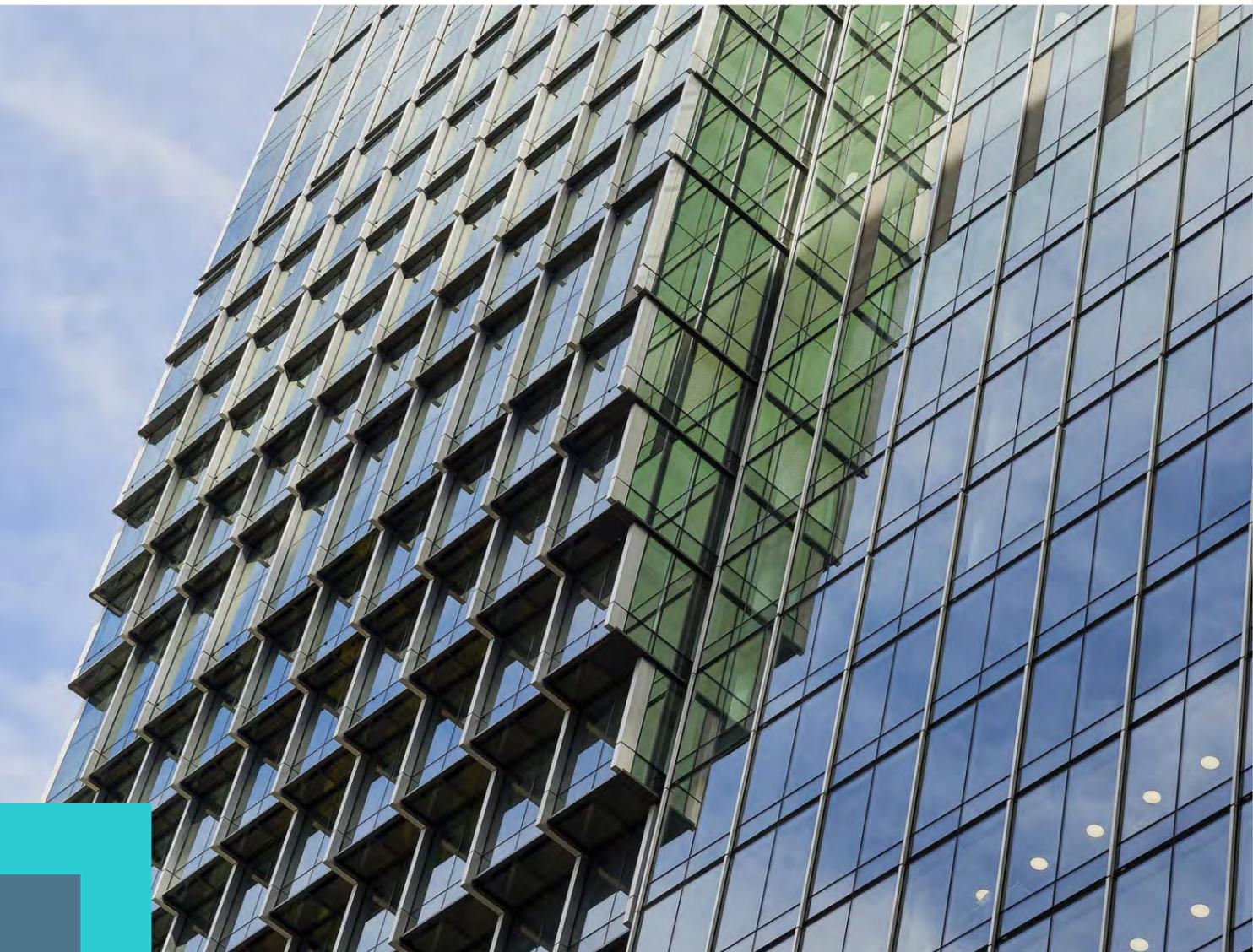
This assessment is intended to provide a high level guiding framework for further action and did not take into account our existing controls to manage these

risk areas or the specific circumstances of individual suppliers. The results of this assessment are set out in the chart above.

We will use the results of this assessment to help inform our prioritisation of suppliers to undertake our supplier pre-qualification questionnaire, which currently focuses on cleaning, security, maintenance and construction suppliers. In FY22 we will invite other high-risk categories identified in the hotspot analysis to be pre-qualified with the longer term aim of ultimately including the first tier of our supply chain in this process.

2. The hotspot analysis was undertaken between the end of the reporting period and the date of approval of this Statement, in relation to FY21 data. It has informed our FY21 modern slavery risks.



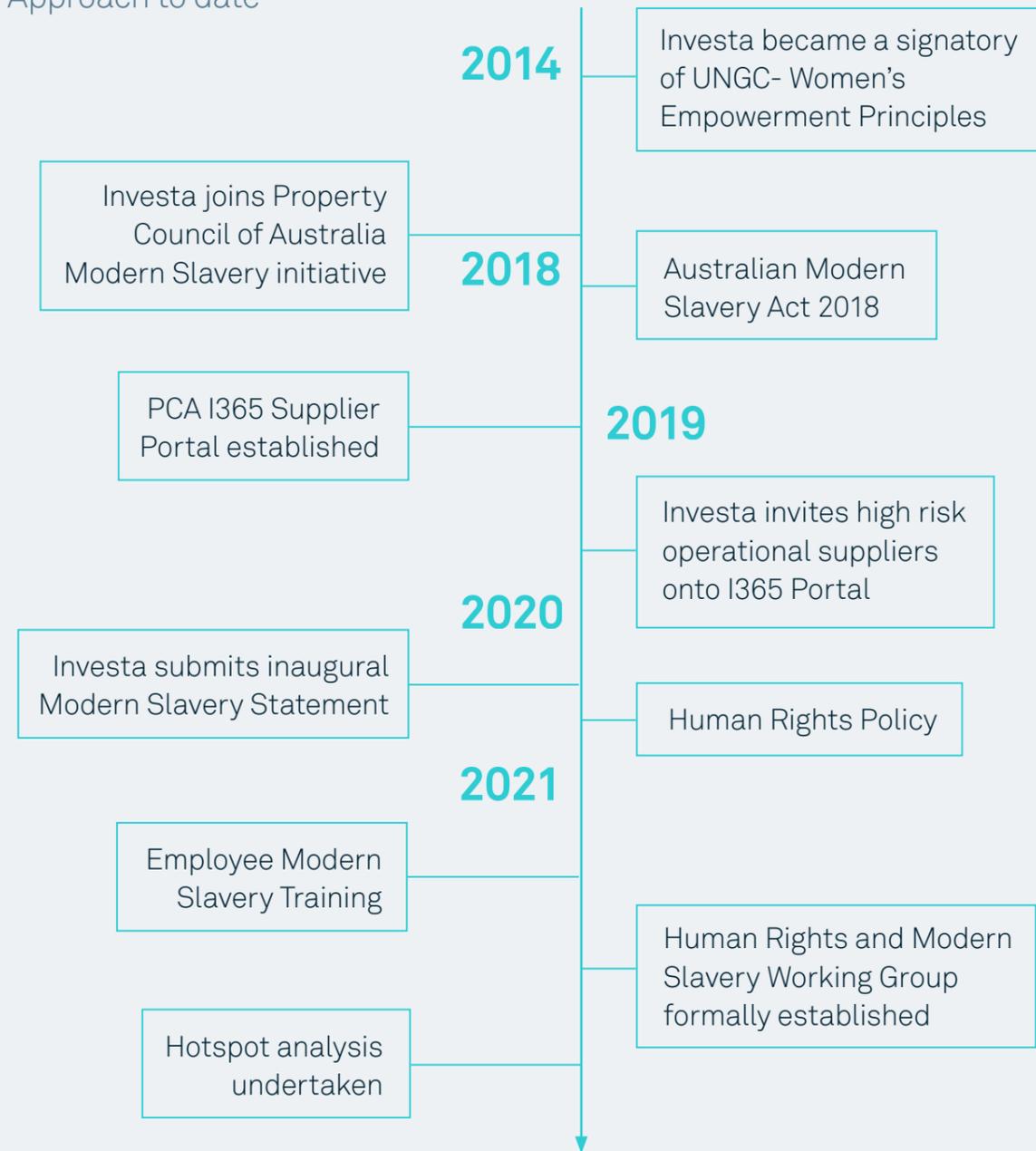


Addressing and Managing Our Modern Slavery Risks

This section of the Statement explains the actions we are taking to address and manage our modern slavery risks. This includes our governance and policy frameworks, supplier engagement, remediation processes and education.

Investa became a signatory of the UN Women's Empowerment Principles, in 2014, which provide guidance on how businesses can empower women in the workplace, marketplace and wider community. We apply these principles in our workforce and with our suppliers, in particular the supplier employee health, wellbeing, safety and modern slavery supply chain practices. In 2018, we began to focus on addressing modern slavery risks in our supply chain. We have established our Human Rights and Modern Slavery framework which has concentrated our actions into three key areas of governance, procurement and education.

Approach to date





Governance and Policy Frameworks

Our governance and policy frameworks provide the foundation for our actions to manage modern slavery risks. We have worked to integrate modern slavery into these frameworks, including defining the responsibility for managing modern slavery across our business.

Modern Slavery Governance

The Investa Office Management Board has ultimate responsibility for overseeing our modern slavery risk management. On a day-to-day basis, our modern slavery risk management response is implemented by our Human Rights and Modern Slavery Working Group (Working Group).

The Working Group has an oversight and advisory role on modern slavery and broader human rights issues across Investa's business functions. It reports and makes recommendations to the Executive Committee and the Board(s) as appropriate, including through presentations to board meetings and in quarterly reporting papers.

Working Group members include Investa employees from legal, risk and compliance, procurement in operations and development, people and culture and sustainability and is chaired by our Chief Operating Officer.

A number of Working Group members also participate in the Property Council of Australia's Modern Slavery Working Group and report back to the Investa business and Boards on the ongoing progress of this initiative.



Policy Framework



Investa has a policy suite which guides our approach to addressing modern slavery, including:

Human Rights Policy

Our Human Rights Policy outlines our commitment to respecting all human rights enshrined in the Universal Declaration of Human Rights and to operating in line with the UNGPs. The Policy includes specific commitments in relation to modern slavery.

Supplier Code of Conduct

The Code outlines our commitment to conducting all business 'in an ethical, legal and professional manner' and sets out the standards Investa requires of suppliers and their sub-tier suppliers when conducting business with Investa. It includes specific requirements in relation to modern slavery, including prohibitions on the use of child or forced labour and the retention of identity documents by employers.

Third Party Supplier Risk Management Framework

Our risk management framework applies to Investa and all our employees. We updated the Framework during the reporting period to include modern slavery considerations into the risk management framework.

Whistleblower Policy

Our Whistleblower Policy provides everyone either working at or with Investa with the means to raise concerns, freely and without fear of repercussions, regarding actual or suspected misconduct or any improper state of affairs within Investa. This could include concerns related to modern slavery involving Investa, or our supply chains.

Investa managed funds (ICPF and OIPP) and mandates are updated on the work undertaken by the Working Group through presentations to board meetings and in quarterly reporting papers.

The Working Group is focussed on continual improvement and will continue to drive the following initiatives:

- A gap analysis of governance policies and procedures and contracts
- Preparation of key inclusions in supply tenders and standard contracts

- Further procurement analysis of risks in our supply chain
- Development of an approach for further supplier engagement
- Detailed documentation of our grievance mechanisms and remediation actions and engagement with our employees and suppliers on this approach
- Understanding further opportunities for employee and supplier engagement and education

Supplier Engagement

Supplier engagement is a core element of our modern slavery risk management.

Investa has integrated an understanding and assessment of how suppliers consider and address modern slavery into our supplier onboarding, tender and ongoing engagement processes. Investa suppliers have been invited to participate in the Informed365 pre-qualification platform, developed by the Property Council of Australia's Modern Slavery initiative. The onboarding of Investa suppliers onto the Informed365 platform, for prequalification of Modern Slavery risks, has been managed in four key stages:

Stage 1: Operational suppliers onboarded to date

Stage 2: Review of construction suppliers on Informed365 – invitation to extend surveys to Investa development services and construction suppliers

Stage 3: Integration of Hot Spot analysis into next round of suppliers onboarded

Stage 4: 100% of suppliers onboarded

"To understand, identify and reduce risks of modern slavery in our supply chain we updated all our capital works contracts to include modern slavery clauses."

Gurol Candemir
Head of Capital Projects

For Stage 1, nearly 70% of our high-focus suppliers have completed or commenced this process. These suppliers support our operations and represented the high risk categories of cleaning, security, building maintenance and services and operational and capital works contractors.

Key insights into our Stage 1 suppliers who completed the survey include:

- **41%** of suppliers understand modern slavery risk and have commenced a risk assessment of their supply chain
- **16%** have identified as a 'reporting entity' under the Modern Slavery Act, the NSW Modern Slavery Act 2018, or under modern slavery legislation in another jurisdiction

As part of Stage 2 onboarding of suppliers, our development teams identified 18 direct construction contractors working on past and current projects. Discussions with Informed365 identified that through the industry-wide collaboration, 78% of these suppliers had already completed the pre-qualification survey, as they also work with other companies in the initiative. Investa is now working with Informed365 and these suppliers to enable us to view and include their existing responses in our analysis, and understand their approaches to modern slavery in their operations and supply chain. The four suppliers not currently on the portal will be invited to participate as part of this Stage 2 initiative.

In addition to these processes, we also use modern slavery clauses in tender and contract processes. The operational and capital works procurement representatives on the Investa Human Rights and Modern Slavery Working Group included modern slavery clauses in tenders that were prepared and undertaken in the reporting year. These clauses require our contractors and suppliers to align with the principles and objectives of the Modern Slavery Act, disclose their practices and advise us of incidences of modern slavery (including their approach to managing grievances). Development procurement representatives will include these clauses in future development contracts.

Remediation Processes

Investa is committed to providing for or cooperating in remediation of modern slavery harm where we identify we may have caused or contributed to it, in line with the UNGPs.

To enable identification of modern slavery risks into our remediation processes, we expanded our Whistleblower Policy to enable all employees and everyone working with Investa to have access to protections for notifying disclosable conduct.

Employees are able to report under this policy and can either make a report directly with their Department Head or can do so anonymously through our whistleblower email. Suppliers and their workers can now also make a report of disclosable conduct (such as modern slavery) directly to the anonymous email. Both processes result in a report and investigation. Confidential feedback is provided to the whistleblower, if possible.

During the reporting period, no modern slavery related complaints were received through our whistleblower process, although we know that this does not necessarily mean we do not have modern slavery in our operations or supply chain.

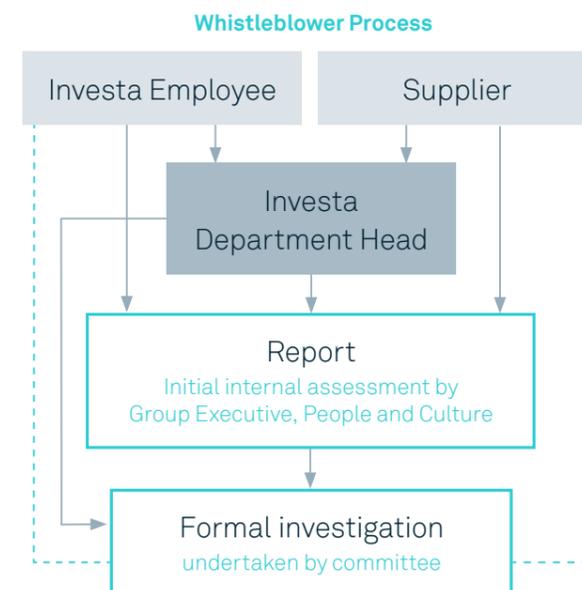
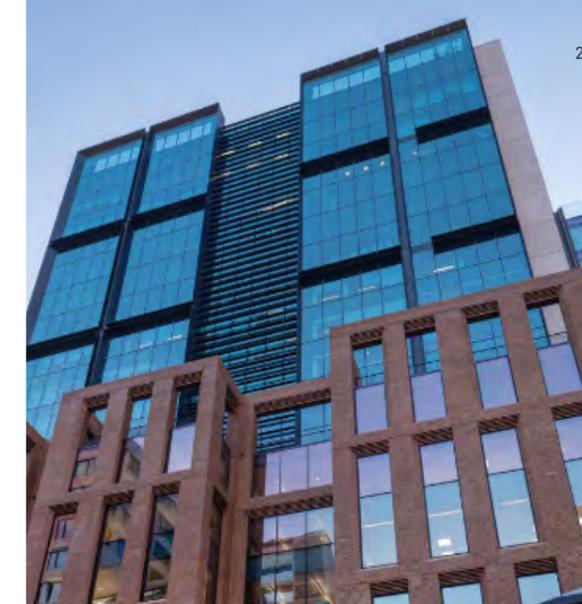
Investa will further develop our remediation processes in FY22.

Education

In our 2020 Statement, we committed to provide training to all employees by the end of the FY21 financial year. This training module was undertaken in June 2021 and provided our employees with information on what constitutes modern slavery and human rights violations across the supply chain, and how modern slavery is relevant to them and their roles.

Members of the Investa Working Group have also participated in a range of industry-led engagements and briefings; and reviewed information papers including:

- Helena Kennedy Centre for International Justice at Sheffield Hallam University paper "In Broad Daylight: Uyghur Forced Labour and Global Solar Supply Chains"



- Australian Border Force reflections from the first reporting period

In addition to training for our employees, we recognise that it is also important to our suppliers' understanding of modern slavery.

Through the Property Council of Australia's Informed365 initiative our suppliers gain access to a range of free online educational resources, both within the platform and through platform partners such as the Supply Chain Sustainability School. In the coming year, this initiative proposes to hold seminars to provide more detailed information sessions, in a range of formats, to enable further collaboration with Property Companies and suppliers and civil society advocates, as well as Government.

Investa, guided by our *Working Group*, has been working towards continuous improvement in our practices, processes and assessments. Assessing the effectiveness of our actions in these areas is important to help us further refine our work to address modern slavery risks.

We understand an effective response to modern slavery involves successful implementation of practical actions that are targeted and tailored to our context and risk profile. This approach will enable us to meaningfully mitigate potential risk areas and, where necessary, enable remediation of any incidents that occur.

We currently monitor the effectiveness of our actions through our Working Group. The Working Group's cross-functional membership provides us with a whole-of-Group perspective and enables us to monitor the progress of risk management actions across the Group.

Assessing Effectiveness

Industry Collaboration

Our collaboration with the Property Council of Australia's Modern Slavery Working Group undertook specific targeted steps to assess the effectiveness of specific actions and initiatives. Between April and June 2021, an independent, third-party review of Supplier Platform responses, on the Informed365 portal, was undertaken by Bureau Veritas. The independent verification and feedback provided through this process has helped us to better understand the effectiveness of the Platform in obtaining data from suppliers and will help inform our future supplier engagement.



Maintaining safe work environments during COVID

We also understand that the health and wellbeing of our employees, tenants, suppliers and partners remains of utmost importance to us through these challenging times and we developed a range of guidelines and tools to support the people in our buildings.

The Safe and Healthy Building Guidelines for tenants and occupants provides guidance on how Investa works collaboratively to create a safer environment in our buildings. Using the Safe Work Australia's National COVID-19 safe workplace principles our guidelines provide:

- An overview of conditions of safe entry to, and use of, Investa's buildings
- Important things to consider while using our buildings
- Information we may need
- The actions Investa has taken to ensure our buildings operate in a safe and healthy way.

We also achieved the International WELL Health and Safety rating across ICPF and OIPP buildings which demonstrates that our buildings operate to the best COVID-19 standards.

The development of these ratings and guidelines involved engagement with our security and cleaning suppliers as well as our building services suppliers to ensure they could continue to operate our buildings in a manner that provided them with a safe and healthy work environment.

We also worked with our contractors on our development, operational and capital works projects to navigate the various disruptions to operations and maintain safe work practices across jurisdictions.

Consultation

Consultation was undertaken by providing updates to relevant Boards, presentations at AGMs and circulation of a draft Statement to directors for approval. This consultation process helped to ensure this Statement accurately reflects modern slavery risks and actions across our corporate structure and build individual entities' understanding and awareness of our modern slavery response.

Our Next Steps

In FY22 we will focus on:

1. Detailed documentation of our grievance mechanisms and remediation actions and engagement with our employees and suppliers on this approach
2. Preparation of key modern slavery inclusions in supply tenders
3. Further procurement analysis of risks in our supply chain
4. Development of an approach for further supplier engagement
5. Understanding further opportunities for employee and supplier engagement and education



Approval and Signature

This Statement was approved by the Board of IWFML on 29 November 2021 as the responsible entity for ICPF, and has been signed by David Baffsky in his capacity as a director of IWFML.

This Statement was also approved by the Board of IOMHL on 26 November 2021 on behalf of its group entities. It has been signed by David Baffsky in his capacity as a director of IOMHL.

A handwritten signature in black ink, appearing to read "David Baffsky".

David Baffsky

Chairman and Independent Director

Investa Office Management Holdings Limited and
Investa Wholesale Funds Management Limited

Appendix 1: Alignment with mandatory criteria

This Statement covers the seven mandatory criteria for modern slavery statements. The table below indicates where in the Statement each criterion is addressed

| Modern Slavery Act 2018 criterion | Explanation | Page |
|-----------------------------------|---|------|
| 1 | Identify the reporting entity | 4 |
| 2 | Describe the reporting entity's structure, operations and supply chains | 8 |
| 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 | 12 |
| 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 | 18 |
| 5 | Describe how the reporting entity assesses the effectiveness of these actions | 24 |
| 6 | Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement) | 25 |
| 7 | Provide any other relevant information | 26 |

