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Workplace Relations and Safety Policy
Ministry of Business, Innovation and Employment

Dear Madam/Sir,

Submission on A Legislative Response to Modern Slavery and Worker Exploitation Discussion Document

Thank you for the opportunity to submit on the 'A Legislative Response to Modern Slavery and Worker Exploitation' Discussion Document (**Discussion Document**).

By way of background, the Insurance Council of New Zealand - Te Kāhui Inihua o Aotearoa (**ICNZ**'s) members are general insurers and reinsurers that insure about 95 percent of the Aotearoa New Zealand general insurance market, including about a trillion dollars' worth of Aotearoa New Zealand assets and liabilities. ICNZ members provide insurance products ranging from those usually purchased by individuals (such as home and contents, travel and motor vehicle insurance) to those purchased by small businesses and larger organisations (such as Product and Public Liability, Business Interruption, Professional Indemnity, Commercial Property and Directors' and Officers' insurance).

Please contact Jane Brown (jane@icnz.org.nz) if you have any questions about our submission or require further information.

This submission has two parts:

- overarching comments, and
- responses to the questions in the Discussion Document.

Overarching comments

ICNZ supports the introduction of a modern slavery and worker exploitation regime

ICNZ is supportive of the proposal to introduce a regime in Aotearoa New Zealand to counter modern slavery and worker exploitation. We acknowledge that Aotearoa New Zealand is currently falling behind other jurisdictions who already have legislation in place, and that in order for New Zealanders and New Zealand entities to be good global citizens, we must play our part in the ongoing efforts against modern slavery and worker exploitation. Introducing legislation specifically for

Aotearoa New Zealand will further strengthen and target efforts across businesses and government, to reduce harm and increase freedom, fairness, and dignity for all people involved in producing the goods and services for which our economy and way of life depends.

Aotearoa New Zealand's regime should seek to avoid creating duplicate responsibilities
When considering what the regime should look like in Aotearoa New Zealand, we urge officials to look to the obligations in other jurisdictions, and to Australia in particular, and to take their lead and/or build on their established practices where possible. A number of general insurers in Aotearoa New Zealand have parent companies in Australia who are already subject to reporting requirements under their equivalent regime. In order to avoid duplication, we believe that Australian disclosure statements should be recognised as meeting the New Zealand disclosure requirements if they are materially similar. The same should apply for those general insurers with USA-based and UK-based parent companies. If obligations are duplicated, then insurers will incur additional compliance costs with no additional benefit (in that they are already able to present reports that would otherwise satisfy the requirements of the regime).

This will be particularly important given our understanding that the regime will apply to all entities "carrying on business in Aotearoa New Zealand". This means that entities domiciled in other jurisdictions, and who may already be subject to other modern slavery reporting requirements, will also be subject to additional reporting requirements here.

Definitions must be clear
While we appreciate that there is a distinction between 'worker exploitation' and 'modern slavery', it appears from the definitions on page 13 of the Discussion Document that there is potential for overlap. The legislation will need to be clear about how these terms are defined, particularly as there are different obligations in respect of each.

It appears from page 32 of the Discussion Document, and from commentary provided during the webinar hosted by MBIE on the 28th of April, that worker exploitation is not intended to include the employer/employee relationship. ICNZ agrees that this is logical because if worker exploitation is defined as being breaches of Aotearoa New Zealand employment legislation there would be recourse and/or the possibility of penalties under such legislation. For clarity, it should be made explicit that the employer/employee relationship is to be excluded from the worker exploitation regime.

Responses to the questions in the Discussion Document

Question 1.
What do you think the key policy objectives should be (see, for example, our proposed objectives on page 26)? Which of these objectives do you think are most important?

ICNZ agrees that the primary objective of the legislation must be to reduce modern slavery and worker exploitation in Aotearoa New Zealand and elsewhere, helping to build practices based on fairness and respect. We do however, question whether the objective should be set at a higher threshold than simply "reducing" the incidence of modern slavery and worker exploitation.

From the list of secondary objectives on page 26 of the Discussion Document, we believe that driving culture and behaviour changes in entities which lead to more responsible and sustainable practices

is the most impactful and, if successful, will hopefully lead to the fulfilment of other objectives such as supporting consumers to make more informed choices in relation to modern slavery and worker exploitation risks associated with goods and services.

Question 2.
Do you think that enough action is currently taken in New Zealand to address modern slavery and worker exploitation across operations and supply chains?

☐ *Yes, the status quo is satisfactory*
☑ *No, more action is needed*
☐ *I do not know*

Please explain why you think enough action is, or is not, taken in New Zealand. If applicable, please explain what changes you think are needed.

As noted in the overarching comments to this submission, Aotearoa New Zealand needs to ensure that it is playing its part in global efforts to counter modern slavery and worker exploitation. At present, we do not believe that there are sufficient measures in our legislation to ensure that entities are considering and responding to modern slavery and worker exploitation risks within their businesses and supply chains.

Question 3.
Do you think that New Zealand's legislation should be amended to better address modern slavery and/or worker exploitation across operations and supply chains?

☐ *Yes, New Zealand's current legislation is sufficient (but non-legislative changes may be needed)*
☑ *No, legislative changes are needed*
☐ *Other*

Please explain why you think New Zealand's current legislation is or is not sufficient.

Please see our response to question 2 above.

Question 3A.
If applicable, which type of broad approach to new supply chain legislation would you most support?

☐ *Disclosure-based (either general or prescribed)*
☐ *Due diligence-based*
☑ *Graduated approach incorporating both disclosure and broader due diligence (proposed)*
☐ *Other*

Please explain why you prefer that approach

ICNZ's preference is for there to be a graduated approach to new supply chain legislation incorporating both disclosure and broader due diligence. We do not believe that disclosure alone would be sufficient to drive the necessary culture change for addressing modern slavery and worker exploitation risks, but recognise that entities will need a reasonable amount of time to understand and efficiently implement due diligence-based requirements.

Consistent with our belief that any obligations ought to be reasonable and proportionate based on the risk the business or its operations presents (expanded on further in our responses below), we

believe that it would be beneficial to clarify the difference between what must be disclosed versus the more in-depth requirements of due diligence, depending on the differing industry/sector/etc.

We also consider it is important that due diligence-based requirements are consulted on to ensure they are reasonable, achievable and therefore serve their purpose. Consideration should also be given to allowing measures to be streamlined at an industry level so as to not burden small to medium enterprises with repetitive compliance requests from multiple clients.

Question 4.
Do you agree that all entities should have to take reasonable and proportionate action if they become aware of modern slavery in their international operations and supply chains, and/or modern slavery or worker exploitation in their domestic operations and supply chains?

☑ *Yes*

☐ *No*

If you answered yes, please explain why. If you answered no, please explain why not.

ICNZ agrees that all entities should have to take reasonable and proportionate action if they become aware of modern slavery and/or worker exploitation. As stated by the Ruggie Framework, and the UN Guiding Principles on Business and Human Rights which stemmed from that framework, while governments have a duty to protect against abuses, businesses also play a critical role in respecting human rights and preventing or mitigating adverse impacts that are directly linked to their operations.

We note that the Chartered Institute of Procurement and Supply has a number of tools that could be leveraged for assessing what is reasonable and proportionate. For consistency and certainty, we consider that use of reputable processes and tools, such as those provided by the Institute, should be recognised when determining whether an entity has taken reasonable and proportionate action.

ICNZ believes that the statement included on page 53 of the Discussion Document that "in cases where no reasonable or proportionate action can be taken … the expectation would be that the entity nonetheless ceases their engagement with the supplier" could risk creating unduly severe impacts (in the insurance context, for isolated communities in particular). For example, if an insurer identified a potential issue in an area with only one vehicle repair provider, a grace period may be required to ensure that customers are not disadvantaged while investigations, remedies and consequences are worked though with the supplier. A 'close supervision' approach may also be appropriate in such circumstances. If the reporting entity had to cease engagement, then it could mean that insureds are left without the ability to have their vehicles repaired, or having their vehicles repaired at increased time and cost (which would likely create flow-on effects in terms of pricing) at a different location.

Consistent with the above, as one of the main principles of countering modern slavery is for entities to engage and remediate any issues on an ongoing basis, we do not believe that entities should cease communicating with suppliers unless it is clear that there is no possibility of resolving an issue. Stopping all communication prematurely may mean that modern slavery conditions continue to exist, which could further harm the victims.

Question 5.
What action(s) do you think would be reasonable and proportionate?

ICNZ believes that entities should put in place non-judicial, operational-level grievance mechanisms, which may include, amongst other elements:

- adopting a victim-centred approach
- collaborating with industry peers
- favouring working with suppliers to eradicate modern slavery rather than removing suppliers automatically based on allegations
- linking up with appropriate support from community groups, local authorities, NGOs, etc.

Question 6.
Do you agree that small and medium-sized entities should have a responsibility to undertake due diligence to prevent and mitigate modern slavery and worker exploitation in domestic operations and supply chains for New Zealand entities they have significant control or influence over?

☑ *Yes*

☐ *No*

If you answered yes, please explain why. If you answered no, please explain why not.

ICNZ agrees that small and medium-sized entities (**SMEs**) should have responsibilities where they have significant control or influence but believe that the due diligence obligations should be commensurate with the entity's size, means and risk exposure. It would seem overly burdensome for all SMEs to be required to have standalone obligations, although we appreciate that there are certain known sectors that are more at risk of modern slavery and/or worker exploitation where it might be appropriate for SMEs to provide a public statement or commitment on modern slavery and worker exploitation to implement training in employee and/or contractor induction materials.

However, even without specific duties imposed, if larger entities are required to meet their own obligations it is likely that requirements relating to modern slavery and worker exploitation will filter down to SMEs via supply chains. While it is arguably in the larger entities' interests for suppliers to already be compliant with the requirements, we recognise that SMEs already face significant compliance challenges and the ability to cope with an additional compliance burden should not be assumed. Given the increase in what corporates already expect of their suppliers, especially around health and safety requirements and carbon emissions reduction and reporting, SMEs would likely be grateful if the Government chose not to impose more obligations on them directly.

Question 6A.
What actions or measures do you think could be reasonable and proportionate for small and medium-sized entities to meet domestic due diligence obligations? Do you think those actions would be reasonable and appropriate generally, or in specific contexts?

Please see our response to question 6 above for actions which we believe could be reasonable and proportionate for SMEs. We see these type of actions as being reasonable and appropriate in specific contexts, rather than being reasonable and appropriate generally.

Question 7.
Do you agree that 'medium' and 'large'-sized entities should be required to annually report on the due diligence they are undertaking to address modern slavery in their international operations and

supply chains, and modern slavery and worker exploitation in their domestic operations and supply chains?

☑ *Yes*

☐ *No*

If you answered yes, please explain why. If you answered no, please explain why not.

ICNZ agrees that medium and large entities should be required to report annually on the due diligence measures they are taking, but strongly believes that the extent of such obligations must be commensurate with the size of the entity. This is also an area where we see alignment with the modern slavery and worker exploitation obligations in other jurisdictions, Australia in particular, as being key. If entities are already required to provide annual reports on due diligence in another jurisdiction, then provided it is materially similar to the Aotearoa New Zealand requirements, we believe that that report should be permitted to be used to meet the reporting required here. ICNZ would not be supportive of entirely separate disclosure requirements for a New Zealand-based entity where they have a parent company already complying with similar obligations in another comparable jurisdiction.

Question 7A.
What information should be compulsory for entities to provide in their annual disclosures?

ICNZ believes that the following information should be compulsory in an annual disclosure:

- A description of industry sectors and categories identified across operations and supply chains (linked to the Standard Industrial Classification (SIC) codes to align with international standards).
- A description of the due diligence processes across operations and supply chains (including clear details on how the process for addressing modern slavery in international operations and supply chains differs from the process in place for addressing modern slavery and worker exploitation in domestic operations and supply chains).
- A description of the modern slavery and worker exploitation risks identified during the reporting period within operations and supply chains.
- Mitigations put in place in response to the risks identified.

Question 8.
Do you agree that 'large'-sized entities should be required to meet due diligence obligations to prevent and mitigate modern slavery in their international operations and supply chains, and modern slavery and worker exploitation in their domestic operations and supply chains?

☑ *Yes*

☐ *No*

If you answered yes, please explain why. If you answered no, please explain why not.

ICNZ agrees that large entities should be required to meet due diligence obligations as this is what is required to meet the objectives behind the modern slavery and worker exploitation proposals. However, we encourage a graduated and risk-based approach to the introduction of any requirements, with a focus on those sectors and suppliers that have been identified as being higher risk in the first instance.

In relation to both this obligation of due diligence as well as that on SMEs with significant control, we note that due diligence is not mandatory under Australian and UK modern slavery legislation. This means that there is potentially limited precedent for Aotearoa New Zealand entities to leverage in terms of meeting the potentially specific and extensive due diligence requirements under legislation here. As such, we consider the regulator/body providing oversight should focus on supporting the development of good practice in the early stages of the regime, with initial enforcement action being only for serious misconduct.

We assume that it is not MBIE's intention to extend the due diligence responsibilities to customers. However, the Discussion Paper suggests that the regime will apply to the "operations" and supply chain of businesses. MBIE appears to take a broad interpretation of "operations" in the definition set out on page 13 of the Discussion Paper, suggesting that it relates to all activity undertaken by an entity to pursue its objectives and strategy, including all material relationships an entity has which are linked to its activities, including for example, investment and lending activity, material shareholdings, and direct and indirect contractual relationships. We would therefore appreciate MBIE making it explicit that "operations" does not extend to include customers, given that entities would not have a sufficient degree of influence and/or contractual control over customers and their operations.

Question 8A.
What actions or measures do you think could be appropriate for large entities to meet domestic and international due diligence obligations? Do you think those actions would be reasonable and proportionate generally, or in specific contexts?

ICNZ supports a programme of actions based on the UN Guiding Principles on Business and Human Rights. The table provided below comes from one of ICNZ's members who has already translated the Principles into pillars of activities in response to the Australian Modern Slavery Act 2018 (Cth):

Our commitment	Our management systems and controls	Our grievance mechanisms and plans for remediation
• Policies • Frameworks and standards • Accountabilities • Stakeholder engagement • Industry participation	• Risk assessment • Capability building • Process consistency • Supplier engagement • Monitoring & reporting	• Grievance mechanisms • Remediation

A risk-based approach such as that in the above framework allows sufficient flexibility so that the action can be reasonable and proportionate depending on whether there is general or specific context.

Question 9.
How far across an entity's operations and supply chains should expectations to undertake due diligence apply?

We believe that the extent of the due diligence obligations should be a risk-based assessment depending on the business area or procurement category's potential exposure to modern slavery

and worker exploitation. If the risk is high, this assessment will require an entity to gradually map modern slavery and worker exploitation risk all the way to the origin of the service or product provided (for example, 'at risk' sourced materials making up the final product).

It will be important for the legislation to be clear on how far down the supply chain each entity needs to go in relation to any checks and balances, including clear accountabilities around direct versus indirect influences each has over their respective supply chains. This is particularly the case if there is an intention to introduce penalties and allow for civil claims against entities.

If a risk-based approach is taken to the extent of obligations, as we suggest, then ICNZ would also be supportive of a requirement for entities to provide sufficiently robust evidence of having carried out this exercise in order to determine their due diligence obligations should it be requested by a regulator and/or body with independent oversight of the modern slavery and worker exploitation regime.

Question 9A.
What could reasonable due diligence activity look like at different supply chain tiers, and how could this be defined or reflected in the legislation?

What is 'reasonable' due diligence activity at the different supply chain tiers should reflect the deemed level of modern slavery and/or worker exploitation risk exposure. At a minimum, we believe that entities should profile and identify inherent risk across their entire supply chain (i.e. tier 1) according to known modern slavery and worker exploitation risk factors (such as vulnerable population, migrant workers, minimum wage workers, and at-risk industries). Based on this inherent risk profile, entities should consider current controls in place for tier 1 (for example, contract clauses, supplier codes of conduct, engagement audits, etc) and decide whether there is a need to enquire further in order to understand and mitigate risks within risk streams for tier 2 and beyond, all the way to origin. Once the inherent risk is mapped across the entire supply chain, the entity could then consider the application of potential additional controls (such as collaboration via industry associations or NGOs, cascading controls via tier 1 requirements, etc).

Question 10.
Are there any types of entities that should not be included in this legislation? If so, please specify and explain why they should not be included.

ICNZ is comfortable for all types of entities to be included in the legislation, as modern slavery and worker exploitation can occur in any type of entity, as long as what is expected of them is proportional to their size, risk profile and resources. If all types of entities are to be included in the regime, then there needs to be a real emphasis on allowing for a reasonable and proportionate response based on the type of entity and the sector in which it operates. For example, insurance company supply chains are typically lower risk for modern slavery versus the likes of the manufacturing or service industries, so any obligations should be tiered accordingly.

Question 11.
Do you agree that 'medium' and 'large' entities should be defined based on revenue?
☑ *Yes*
☐ *No*

☐ *Other*
Please explain your view

ICNZ agrees that either revenue or employee numbers would be relevant indicators of company size and reach. ICNZ particularly agrees with the proposal on page 64 of the Discussion Document that revenue should include taking into account the revenue of any of the entity's subsidiaries and all sources of revenue, including grants or donations etc. This will ensure that entities are subject to obligations that accurately reflect their true size.

Question 12.
What do you think the revenue threshold for defining a medium-sized entity should be? Please specify what you think the amount should be and explain why.

ICNZ is comfortable with the proposed threshold of an annual revenue level of $20 million.

Question 13.
What do you think the revenue threshold for defining a large-sized entity should be? Please specify what you think the amount should be and explain why.

ICNZ is comfortable with the proposed threshold of an annual revenue level of $50 million.

Question 14.
How could the proposals and/or the implementation of the proposals better reflect Kaupapa Māori and Te Tiriti o Waitangi principles?

ICNZ is not in a position to provide meaningful feedback on how the proposals in the Discussion Document could better reflect Kaupapa Māori and Te Tiriti o Waitangi principles, nor how the proposals might affect Māori. We encourage MBIE to engage with the likes of Te Puni Kōkiri to ensure that the full range of Māori perspectives are heard.

Question 15.
Are you aware of any disproportionate impacts (positive or negative) this legislation could have on Māori entities? Please explain what impacts may apply, if any.

Please see our response to question 14 above.

Question 16.
Are you aware of any disproportionate impacts (positive or negative) this legislation could have on Māori individuals? Please explain what impacts may apply, if any.

Please see our response to question 14 above.

Question 17. What types of non-compliance should lead to enforcement action?

ICNZ believes that there are a number of areas of non-compliance that should lead to enforcement action. Those are:

- Non-response to known modern slavery or worker exploitation incidents or allegations.
- Intentional failure to report or providing false or misleading information in a report.

- Failing to address any mandatory reporting criteria.
- The provision of a false and misleading attestation by a reporting entity's supplier (any enforcement action should be on the supplier who provided the false attestation, not the reporting entity).

Question 18.
Do you think there should be different offences and tools to deal with non-compliance with different obligations (such as for disclosure versus due diligence)? Should these differ depending on the size of the entity (or other factors, such as whether an entity is run by volunteers)?

ICNZ agrees that it would be appropriate to have different offences and tools available to deal with non-compliance with different obligations. We also agree that the offences and tools should differ depending on the size and nature of an entity. The response to non-compliance should ideally reflect the importance of the legislation's objectives while also recognising the different circumstances of the entities subject to the regime and that for example, in some cases, education may be more appropriate in response to non-compliance than punitive measures.

Question 19.
What comparable legislation do you think we should consider in developing the penalties framework for this legislation?

We recommend looking to the penalties initially considered under the UK, Australian and French legislation (noting that, in their final form, financial penalties were not included for most of the regimes which are limited to disclosure requirements).

Question 20.
What responsibilities, if any, should members of the governing body of the entity (such as the directors and board of a company) be personally liable for?

The position taken should be consistent with the Australian legislation, which does not impose penalties on entities or boards that fail to meet their reporting obligations but allows the relevant Minister to make a written request to the entity to provide an explanation for the failure to comply, to undertake specified remedial action, or both. If the entity does not meet that request, the Minister may publicise that fact on the Modern Slavery Statements Register.

Question 21.
Should victims onshore and offshore have the ability to bring a civil claim against an entity that has failed to meet its responsibility? If so, please explain why. If not, please explain why not.

In theory, ICNZ is supportive of allowing victims to have the ability to bring a civil claim against an entity that has failed to meet its responsibilities as this supports access to justice. However, in practice, we question whether victims of the types of activity leading to modern slavery and worker exploitation, and particularly where victims are offshore, would have the resources to bring a claim.

If the legislation does provide the ability for victims to bring a civil claim, then to ensure that there is a causal link between the entity's actions (or lack thereof) and the harm caused, we believe that there must be reference to incidents occurring within the entity itself, or within supply chains that

form an integral part of their business operations. This could be done by clearly defining the "responsibility" that an entity has failed to meet.

Question 22.
Should entities be required to remedy any harm they have caused or contributed to, where there is a clear link between their actions and the harm? If so, how should this link be demonstrated and what types of remediation would be appropriate?

ICNZ believes that entities should be required to remedy harm that they have caused or contributed to where there is a clear link between their actions and the harm. This link could be established via a simple "but for" test (i.e. would the harm have occurred "but for" the action/inaction or failure to comply with their obligations by the entity). The type of remediation that is appropriate should be dependent on the type of harm that has been caused and could be recommended following assessment of the harm by an independent professional adviser.

Question 23.
Is an independent oversight mechanism required, or could this oversight be provided by Government and civil society?

☑ *Yes (an independent oversight mechanism is required)*
☐ *No (oversight can be provided by Government and civil society)*
☐ *Other*

Please explain your view.

We believe that oversight would best be provided by an independent commissioner, similar to what is done in New South Wales. We agree with the benefits an independent oversight mechanism can provide, as opposed to it being a government function, outlined in the Discussion Document such as engaging with victims and providing an impartial view.

Question 23A.
If independent oversight is required, what functions should the oversight mechanism perform?

Consistent with our response above, we believe that the functions should mirror those of the New South Wales Anti-Slavery Commissioner set out on page 70 of the Discussion Document, i.e. advocating for and promoting action to combat modern slavery, identifying and supporting victims, providing information and education, raising awareness, and monitoring reports on the risks of modern slavery occurring in the supply chains of government agencies.

Question 24.
Do you think a central register for disclosure statements should be established? If so, please explain why. If not, please explain why not.

☑ *Yes*
☐ *No*

Do you have any other comments or suggestions?

ICNZ agrees that a central register would be beneficial for a number of reasons. It would ensure that companies are disclosing consistently and allow entities to learn from one another, as well as allowing the public to be consistently informed of entities' activities in the modern slavery space.

Question 25.
What support services, products or other guidance do you think are most needed? What would be of greatest benefit to you?

ICNZ would be very supportive of implementation guidance to accompany the legislation, support for industry collaboration, and support on implementation of international human rights law and for any new modern slavery laws with international implications. We also encourage MBIE to look at the findings and recommendations in the Australian report 'Paper Promises? Evaluating the early impact of Australia's Modern Slavery Act'. The report concludes that certain companies in known, high-risk sectors are failing to comply with their mandatory reporting requirements and failing to identify or disclose obvious modern slavery risks and makes a number of recommendations to improve the regime, one of which is to issue sector-specific guidance for high-risk sectors, which will help entities better understand their risks and the harm that can be caused by modern slavery.

Question 26.
What do you consider would be needed from the regulator to support the adoption of good operational and supply chain practice, and compliance with the proposed responsibilities?

The regulator would need to have a deep understanding of the Aotearoa New Zealand domestic and international legal frameworks and the business application in both domestic and international contexts.

Question 27.
Do you consider a phase-in time is needed for this legislation? If so, do you consider the phase-in should apply to the responsibilities or application of penalties, or both? Do you consider a different phase-in period should apply in relation to domestic responsibilities compared to internationally-focused responsibilities?

ICNZ considers that this legislation would need a phase-in time for responsibilities. This regime could take a similar approach to that of the XRB requirements on climate-related disclosures where first-time adoption provisions allow for companies to take a stepped approach to compliance and disclosure in some areas.

There should also be a phase-in time for penalties. Given it will be a new regime, we consider the regulator/body providing oversight should focus on supporting the development of good practice in the early stages of the regime, with initial enforcement action being only for serious misconduct.

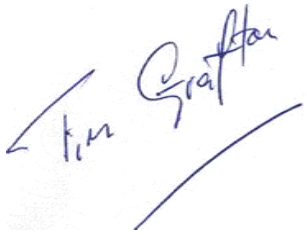
Question 28.
What additional monitoring, evaluations and review mechanisms are needed, if any, to support this legislation?

We recommend that a review mechanism is provided for in the legislation. We note that there appear to have been a number of failings in the Australian regime in the less than three years' of its operation and they have now commenced a review. It is important that if our legislation does not operate as intended, or there is not a noticeable reduction in modern slavery and worker exploitation, that there are the appropriate mechanisms built in for review and amendment.

Conclusion

Thank you again for the opportunity to submit on this matter. If you have any questions about our feedback, please contact our General Counsel by emailing jane@icnz.org.nz.

Yours sincerely,



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