



Bartier Perry Pty Limited

ACN 124 690 053

trading as



Modern Slavery Statement FY21

December 2021

www.bartier.com.au





A message from the Chief Executive Officer of Bartier Perry

At Bartier Perry, our focus is firmly on our clients, our people and our community. Like many organisations, we are increasingly aware of our obligations around environmental, social and governance (ESG) practices and policies. Respecting human rights forms part of our governance and is core to our values and culture.

We are committed to meeting both client, employee and community expectations, demonstrating the highest standards of business ethics and managing our relationships in a transparent and responsible manner.

At Bartier Perry, we welcome the Commonwealth and State Modern Slavery legislation and are committed to ensuring Modern Slavery does not form part of our organisation's supply chain. We recognise that whilst our sector & industry, geographic, entity, product & services risks are low, it is important to our firm that we eliminate modern slavery in our supply chain. This process is in its early stages.

Over this reporting period, we will continue with the process of implementation and continuous improvement of our Modern Slavery framework by updating existing or introducing new policies, training staff to raise awareness and implementing a more robust supplier due diligence program.

To support increased corporate accountability, including greater transparency for the management of human rights within organisations, operations, supply chains and investments, the Board of Directors, on 24 November 2021, approved this, our first Modern Slavery Statement, outlining our strategy, actions taken to date and our plans for 2022.



Riana Steyn
Chief Executive Officer



Andrew Frankland
Director and Board Chair

LEGACY

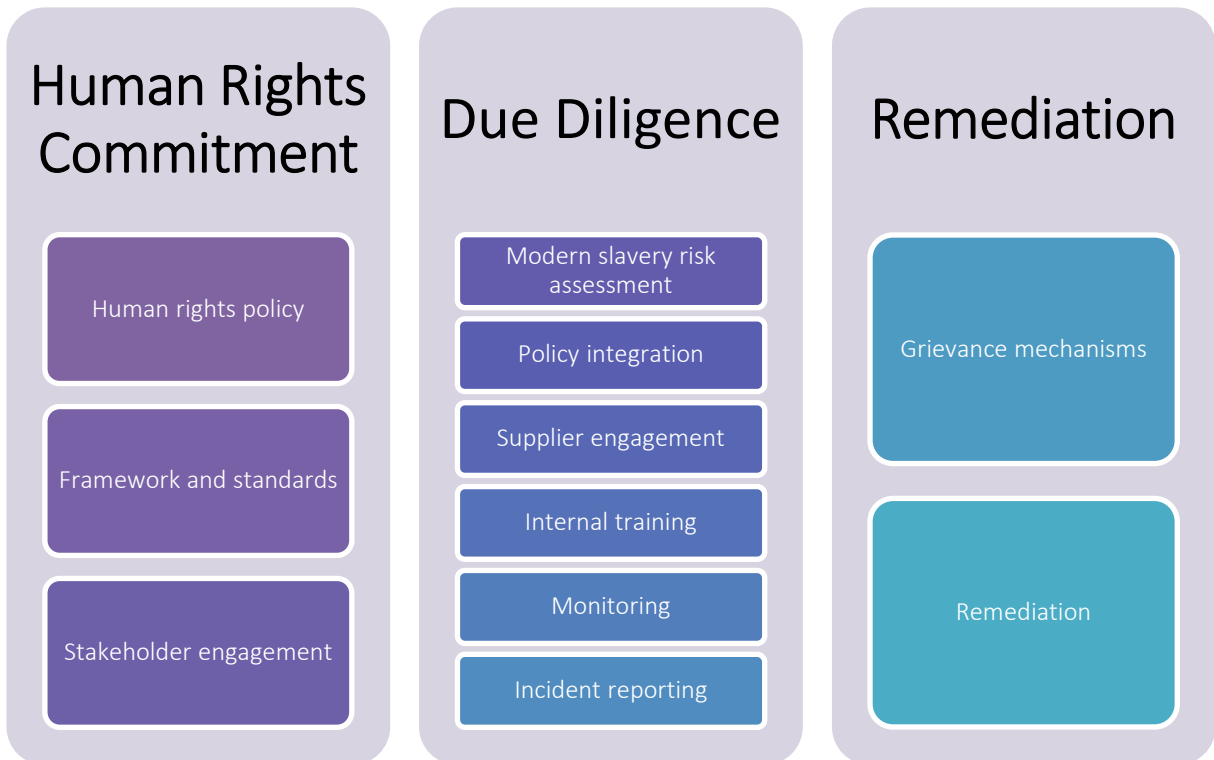
1. Overview of Bartier Perry's modern slavery tracking

Bartier Perry Pty Ltd ACN 124 690 053 (**Bartier Perry**) is committed to the continuous work necessary to ensure that there are no modern slavery practices within its operations and supply chains.

We recognise the importance of ongoing due diligence in identifying and appropriately addressing the risks of modern slavery practices within our operations and supply chains.

After reviewing the nature of our business, we consider that our direct impact in relation to modern slavery practices is low. As a mid-sized organisation with approximately 168 employees, we are committed to developing a robust, three-tiered framework which focuses on our human rights commitment, due diligence and remediation as illustrated in the image below and which is in line with the resources available to us.

Our developing modern slavery response is informed by the *United Nations Guiding Principles on Business and Human Rights*. While we are in the early stages of acting to address the modern slavery risks, we have identified, we endeavour to implement management processes and controls to integrate our findings, track our progress and to provide effective remediation to individuals and communities impacted by modern slavery.



2. Our structure, operations and supply chain

Who are we?

The reporting entity of this Modern Slavery Statement is Bartier Perry Pty Ltd ACN 124 690 053 (**Bartier Perry**).

Bartier Perry is a law firm operating in Sydney, New South Wales. Bartier Perry has two fully owned subsidiaries, Dalbo Pty Ltd (**Dalbo**) and BP & P Unit Holder Pty Ltd (**BP&P**) as shown in the diagram to the right.

For the period 1 July 2020 to 30 June 2021 (**Reporting Period**) Dalbo leased the office space of Bartier Perry's premises and did not undertake any other trading activity. BP&P is the sole unit holder in the B.P. & P Unit Trust. The trustee of the B.P. & P Unit Trust is Dalbo. Both BP&P and the Unit Trust were non-trading during the Reporting Period.

On 30 June 2021 Bartier Perry had a total workforce of 168 employees.

Our operations

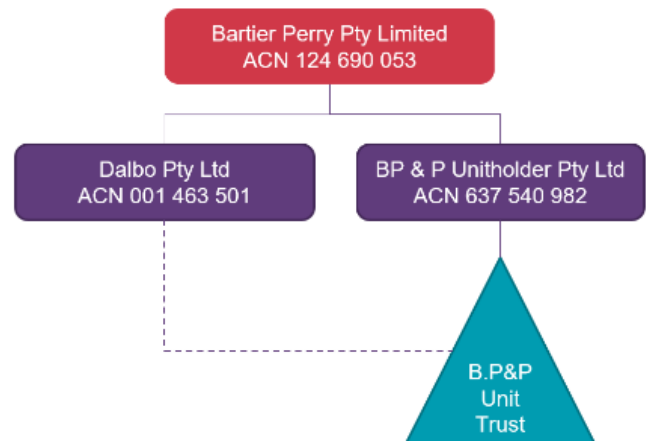
All Bartier Perry's operations are conducted in Australia. The key activities of Bartier Perry operations include:



Direct employment of staff in Australia

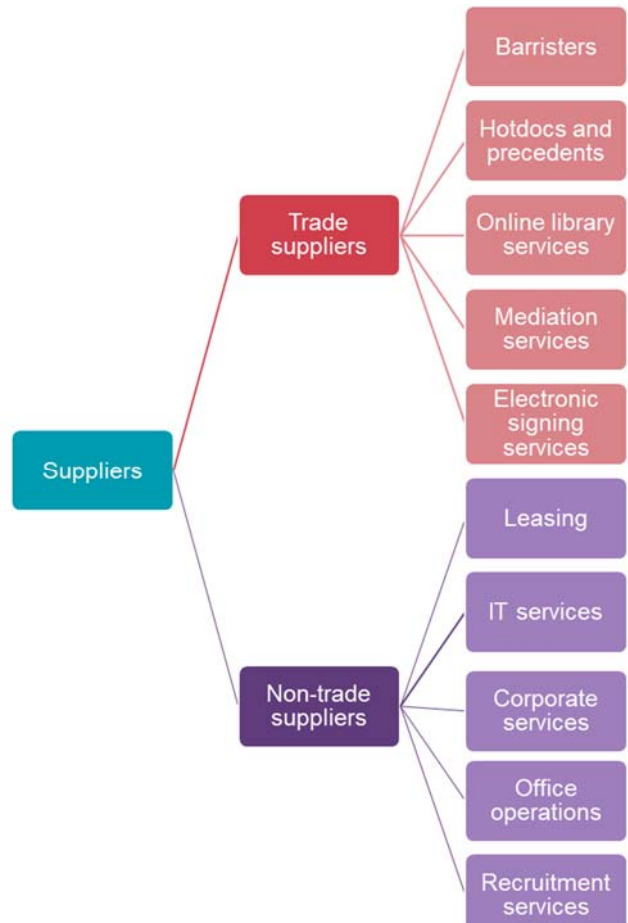


Provision and delivery of legal services



Our supply chain

The main categories of goods and services procured in the Reporting Period are:



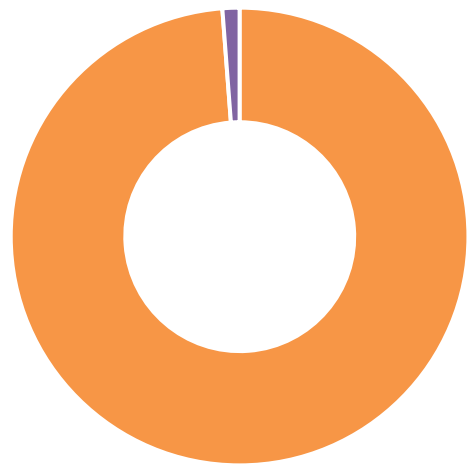
Location of Bartier Perry's suppliers



United States of America
IT software



In the Reporting Period, 99% of Bartier Perry's suppliers were based in Australia



■ Australia ■ United States of America

- Australia**
- Barristers
 - Online library services
 - Mediation services
 - IT services
 - Corporate services such as legal, accounting and finance
 - Leasing of office
 - Office operations such as cleaning and maintenance
 - Recruitment services
 - IT and Office equipment

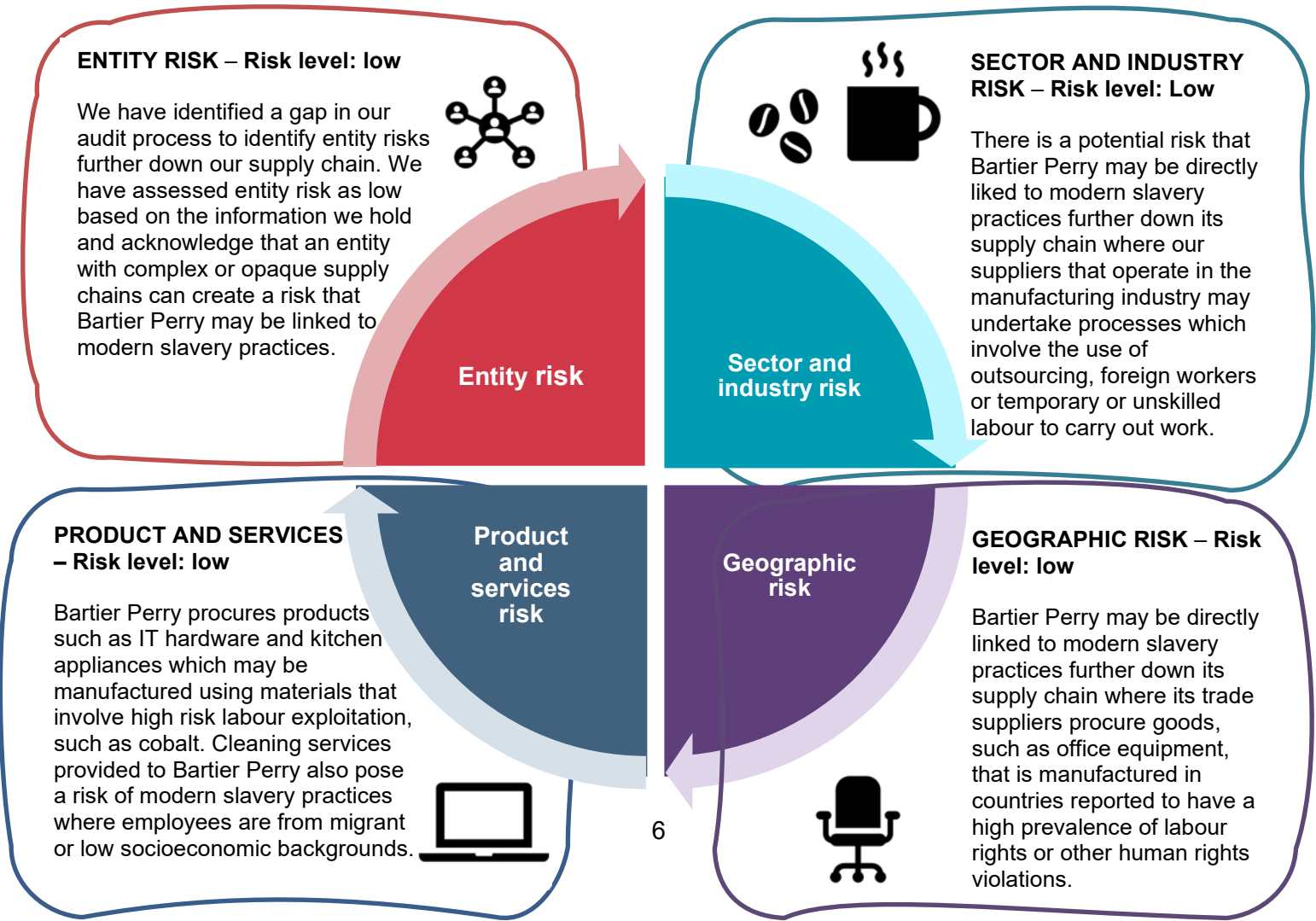
3. Our modern slavery risks

Bartier Perry acknowledges the complexity of modern slavery risk and the ways it can manifest in operations and supply chains. In 2021 Bartier Perry undertook an assessment of the modern slavery risks within our operations and first-tier suppliers. We acknowledge modern slavery risks may exist within the legal industry however, given the size of Bartier Perry and our large supplier base, we do not have the resources to examine modern slavery risks beyond our first-tier suppliers. Notwithstanding this limitation, we are looking to do our best as we further improve our modern slavery processes and engagement with our suppliers.

We are focused on increasing supplier engagement to assist us and our suppliers in identifying modern slavery risks. In instances where our suppliers have published their own Modern Slavery Statement, we have considered these in undertaking our assessment.

99% of Bartier Perry’s suppliers are based in Australia and the provision and delivery of Bartier Perry’s services and the employment of our staff occur in Australia. We consider the risk of modern slavery within our operations and the first tier of our supply chain as low.

We recognise Bartier Perry may be directly linked to modern slavery practices through the various tiers of our supply chains. These risks are identified below:



4. Our actions



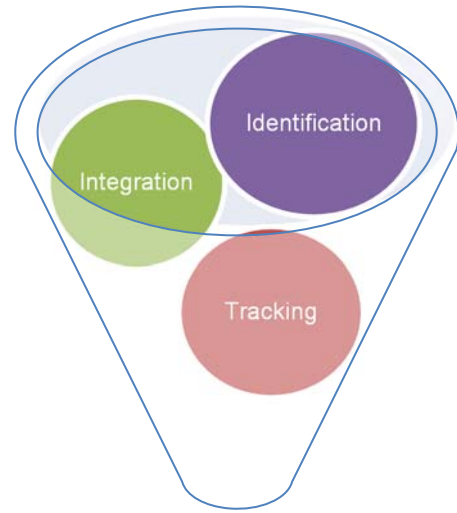
Due diligence

Bartier Perry is committed to preventing modern slavery practices in its operations and supply chains. We recognise the importance of modern slavery due diligence as an ongoing process and as a vital part of our role to prevent modern slavery practices.

All Bartier Perry labour is sourced locally. We have internal policies in place that comply with Australian and international labour laws such as our *Freedom from Bullying, Discrimination & Harassment Policy* and our *Workplace Health Safety Manual*.

We are in the process of implementing new clauses in our supplier agreements which will require a new supplier to acknowledge it has no knowledge of Modern Slavery in its own operations or supply chain and that it will take reasonable steps to prevent the occurrence of Modern Slavery in its operations and supply chain.

Bartier Perry does not yet have processes in place to integrate and track modern slavery risks within our operations and supply chains.



Public communication

We are putting into place management systems and controls to address impacts through internal training on modern slavery and incident reporting. Part of those processes include obtaining professional advice.

We are also in the process of implementing controls to monitor our progress of implementation actions on a regular basis.

 Identification <ul style="list-style-type: none">• Clauses in Supplier Agreements addressing Modern Slavery for new suppliers	 Integration <ul style="list-style-type: none">• We are in the process of implementing compulsory internal modern slavery training and processes for incident reporting	 Tracking <ul style="list-style-type: none">• We are working towards implementing an internal audit of our supplier screening processes to monitor our progress	 Public Communication <ul style="list-style-type: none">• Publishing our FY2021 Modern Slavery Statement
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Remediation

Bartier Perry recognises that, while we do not directly cause or contribute to modern slavery, we may be linked to modern slavery practices by a business relationship.

We acknowledge that given the size of our business, Bartier Perry has limited leverage to influence some of our larger suppliers to change their behaviour. Notwithstanding, Bartier Perry is committed to using what leverage we have to work with suppliers that have caused adverse impacts to prevent or mitigate harm and its recurrence.



Bartier Perry has a Whistleblower Policy which aims to provide a reporting and investigative mechanism that is confidential. The Policy applies to all officers, employees, contractors, and suppliers of Bartier Perry and their relatives.

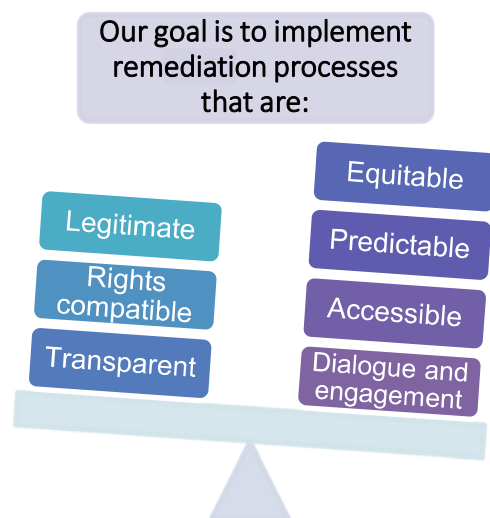
Our Whistleblower Policy does not explicitly identify Modern Slavery as a wrongdoing which may be reported. Part of our modern slavery response will involve updating our Whistleblower Policy to rectify this.

We recognise there are gaps within our current processes and as a result, Bartier Perry does not currently have remediation processes for individuals and communities affected by modern slavery practices and other human rights abuses in our supply chains.

Bartier Perry commits to addressing human rights grievances. We are in the process of developing a robust modern slavery response framework which will be introduced over the next 12 months and provide more effective grievance mechanisms and avenues for affected individuals and communities. Some of these mechanisms are listed in the diagram below.



Our developing strategic approach to remediation is informed by Principle 31 of the *United Nations Guiding Principles on Business and Human Rights* and aims to provide grievance mechanisms that are 'effective' in so far as they can be characterised as being:



5. Assessing the effectiveness of our actions



Bartier Perry's monitoring and reporting program is currently under development. Our objective is to operationalise the fundamental human rights due diligence principles in line with the *United Nations Guiding Principles on Business and Human Rights*.

We recognise the process of developing a robust, effective, and sustainable monitoring program requires time and resources.

Our focus this year has been to understand where we are, implement a framework for awareness of modern slavery risks in the workplace and to identify and address the risks as best as we are able to. These initial steps will assist us in building a strong foundation to monitor the effectiveness of our actions.

6. Process of consultation



In light of the limited trading activities of Dalbo Pty Ltd during the Reporting Period, consultation with Dalbo Pty Ltd was not required.

Consultation with BP & P Unitholder Pty and B.P. & P. Unit Trust was not required given both entities were non-trading entities during the Reporting Period.



7. Any other relevant information

Continuous improvement: planned next steps

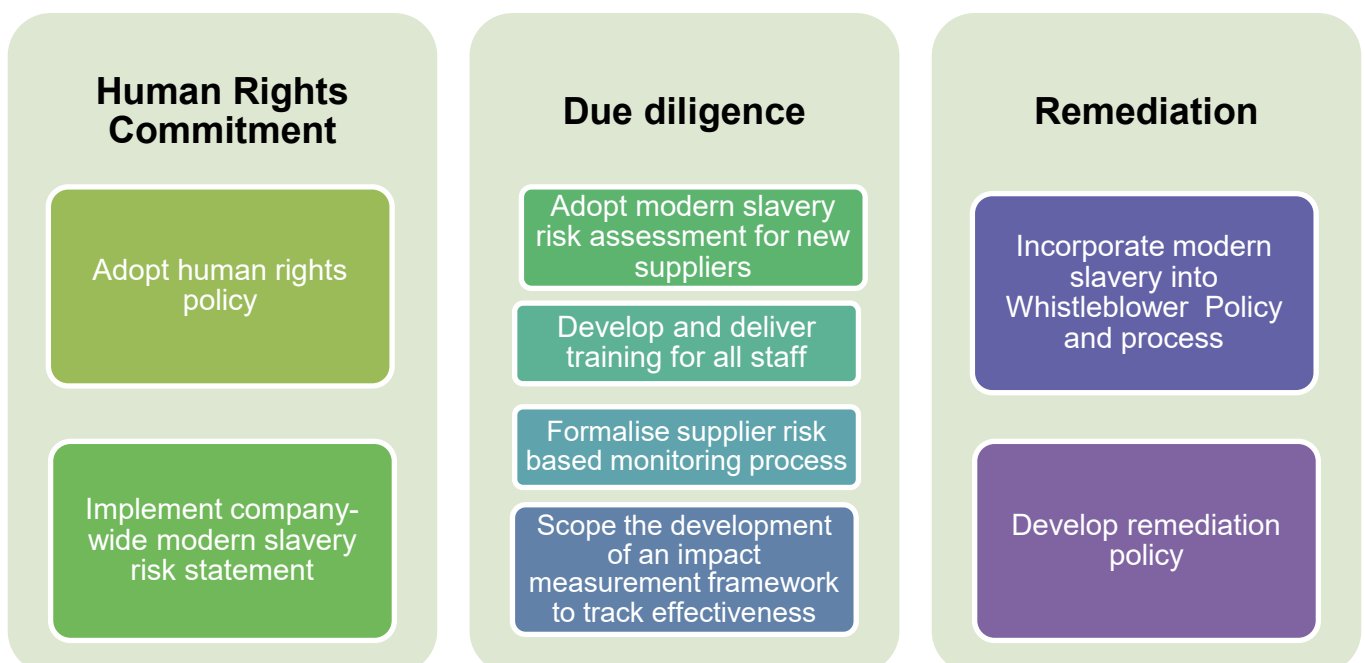
Bartier Perry is a mid-size business of 168 employees. It's primary focus and allocation of resources is to develop its frameworks and internal processes. As those frameworks and processes are implemented and consolidated, it is anticipated Bartier Perry will, in the future, be able to investigate other matters, such as a more detailed review of the downstream supply chains of its first-tier suppliers, to further assess and identify Modern Slavery risks.

Bartier Perry is seeking advice and developing processes in a way which aligns with our resources and abilities. Bartier Perry is committed to managing Modern Slavery issues in an appropriate manner given the low level of risk assessed for Modern Slavery in its operations and supply chains.

Since 1 July 2021, Bartier Perry has taken steps to improve its awareness of Modern Slavery risks and how to respond to those risks. There is a desire within the organisation to commit to implementing a Modern Slavery framework and a process of continuous improvement to address Modern Slavery issues in its operations and supply chains.

Over the next year, Bartier Perry will progress the implementation of its due diligence processes and its grievance mechanisms. Bartier Perry aims to commence developing processes to assess the effectiveness of its actions.

The table below provides an overview of Bartier Perry priorities for FY22.





For queries relating to this statement:

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December 2021.