

## THOMSON GEER

**Modern Slavery Statement** 

#### Who we are

Thomson Geer (**TG**) is a major Australian corporate law firm. We have more than 560 people, including 126 partners operating out of our offices in Sydney, Melbourne, Brisbane, Perth and Adelaide. TG is a full service firm and many of the firm's practitioners are acknowledged as leading lawyers. By size, we are one of the 10 largest firms operating in Australia.

The firm structure is a partnership with a Chief Executive Partner (**CEP**) and Board of Directors, all of whom are ultimately accountable to the partners, the owners of the firm. A National Executive Team report to the CEP.

Lawyers and professional staff are employed by the partnership. Our shared services function and administrative staff are employed by a services trust, Thomson Geer Services Pty Ltd.

TG has also assisted a range of clients in developing their business' approach to modern slavery.

## **Our operations**

TG is a professional services practice, with our core business activity being the provision of legal services to our clients.

TG's operations are based in Australia but we provide legal services to a variety of clients based both in Australia and overseas. As a full service commercial firm, we are able to call on expertise in a wide variety of practice areas and provide our clients with comprehensive solutions for all their legal needs.

We offer national best practice specialist skills and experience across Banking, Construction, Corporate and Commercial, Disputes and Litigation, Employment, Intellectual Property and Information Technology, Property and Tax.

## Our supply chain

Our supply chain consists predominantly of goods and services procured for the purpose of enabling our people to deliver legal services to our clients. The main goods and services that TG procures include:

- cleaning;
- · hospitality and catering;
- recruitment:
- marketing and merchandise;
- equipment supply;
- couriers and postage;
- travel and taxis;
- training at Registered Training Organisations;
- insurance;
- · telecommunications; and
- parking.

We also procure the following on behalf of our clients:

- barristers;
- document management and eDiscovery; and
- data rooms.

## Modern slavery risks

As a professional services firm TG has a low number of suppliers, however TG appreciates that risks of modern slavery may be present in its supply chain as a result of the geographic location of some suppliers and source materials used in products supplied to TG.

In particular, TG acknowledges that China and other locations in South East Asia have a higher prevalence of modern slavery.

TG also accepts that there are additional risks of modern slavery that may exist in areas where TG lacks insight into the second tier suppliers and source materials behind products and services supplied directly to TG.

The steps TG is taking to address these risks include:

- the use of any third party supplier must be authorised by the CEP or Chief Operating
   Officer in accordance with the process below;
- a materiality threshold has been implemented where any supplier where TG has spent over \$10,000 on their products or services is identified by TG's Finance Department as an approved supplier (Approved Supplier) in the relevant financial year;
- Approved Suppliers are added to an Approved Supplier register located on the firm's intranet and in the CRM:
- a Third Party Supplier Audit Questionnaire has been created which will be sent annually to all Approved Suppliers asking for information on the company's practices including relating to modern slavery; and
- responses to the Third Party Supplier Audit
   Questionnaire are assessed and any issues
   identified and remediated. If incapable of
   satisfactory remediation, the supplier will
   cease to be an Approved Supplier and will no
   longer be engaged by Thomson Geer.

# Our approach to modern slavery In our operations

TG has no modern slavery practices within its own operations. We have a dedicated human resources team with representatives on the ground in each of our offices. We also regularly seek advice from our own large team of employment law specialist lawyers regarding applicable minimum entitlements for our staff.

We comply with relevant Australian workplace laws, including those that deal with employment conditions and safety, and other community expectations and ethical standards.

We are committed to creating and maintaining an inclusive and safe environment for all staff members, which includes treating workers with dignity and respect, and providing a workplace free from discrimination and harassment. We aim to achieve this through our policies on Discrimination, Harassment and Bullying and Work Health and Safety, as well as through providing annual training to our staff.

TG has also included modern slavery as a topic in its compulsory continuing professional development sessions, which all professional staff are required to attend.

#### In our supply chains

In the 19/20 financial year TG has taken a number of steps as part of a plan to address modern slavery risks in its operations and supply chain.

#### **Policies**

During the 19/20 year TG commenced work on a new Modern Slavery Policy, which was implemented later in 2020. The policy applies to any person or entity working for or on behalf of, or providing services to or doing business with, Thomson Geer in any capacity, including all suppliers, employees, officers, contractors, subcontractors and consultants. The policy sets out:

- our requirements for suppliers in relation to their treatment of workers and compliance with labour laws and standards;
- how we aim to address risks of modern slavery;
- the consequences of breaching the policy; and
- how concerns about modern slavery can be reported to TG.

#### Due diligence program and supplier engagement

TG has commenced a due diligence program to provide TG with greater insight into the operations of its suppliers and allow TG to further assess the risks of modern slavery within its supply chain.

As part of this program TG has developed a Third Party Supplier Audit Questionnaire which has been provided to our Approved Suppliers.

The audit questionnaire seeks information from suppliers about:

- their workforce and working conditions;
- any history of modern slavery or noncompliance with workplace laws;
- their policies and processes for identifying and addressing modern slavery risks; and
- their suppliers and systems they have in place to determine whether risks of modern slavery are present in those suppliers.

Any supplier which has risks of modern slavery through their supply chain will be removed as an Approved Supplier, or if the risk is not material, be given an opportunity to remedy the identified risk.

As part of a broader modern slavery plan, TG intends to highlight the risks of modern slavery that may exist in its supply chain through a number of measures including:

- where possible, reviewing and amending supplier agreements to include terms relating to modern slavery;
- continuing its training of employees to create greater awareness of modern slavery; and
- annual surveying and maintenance and enforcement of its Approved Supplier list.

## **Reviewing our systems**

TG is committed to effectively assessing and addressing modern slavery risks in its operations and supply chain. TG has implemented an annual review of the arrangements it has in place to address modern slavery risks in its operations and supply chain to determine whether they are effective.

In the coming year the information that is gained through our supplier questionnaire will be used to measure the effectiveness of the current systems we have in place. The extent to which we have achieved the other measures in our modern slavery plan will also inform us on the effectiveness of our approach to modern slavery.

#### Consultation

TG's board has responsibility for governance across its business and therefore has oversight into risks of modern slavery across its operations. As TG's procurement is managed through a central system, it has insight into risks of modern slavery in its supply chain that may exist across its all parts of its business.

#### Other information

#### Legal services

TG recognises its position to assist its clients with their own approach to modern slavery.

Over the last two years TG has hosted a number of free client presentations on the topic of modern slavery. These presentations aim to inform clients about their obligations under the Modern Slavery Act 2018 (Cth) and how they can approach assessing and addressing risks to modern slavery in their operations and supply chains.

TG has also assisted a range of clients in developing their business' approach to modern slavery.

## **Corporate Social Responsibility**

Whilst the below initiatives do not directly address risks relating to modern slavery, as a member of the wider Australian business community TG recognises its responsibility to make a meaningful commitment to corporate social responsibility, diversity and sustainability.

These initiatives aim to improve the welfare, living standards and access to justice of others, which ultimately promotes a society in which basic human rights (including the right to proper working conditions) is valued.

The firm is a member of the Australian Legal Sector Alliance which is an organisation focused on working with law firms to promote best practice sustainability across the legal sector, encompassing sustainable and inclusive workplaces, community support, environmental conservation and responsible governance.

#### Pro bono

At TG, we understand the importance of giving back to our community. This involves helping to ensure that all members of that community have access to legal representation and advice, and seeking opportunities to provide support for worthwhile causes.

An initiative our firm is committed to is the provision of pro bono legal advice to marginalised and disadvantaged groups across the States in which we operate. TG is a signatory to the National Pro Bono Resource Centre's aspirational target of 35 hours of pro bono legal work per practitioner per year (in fact, our lawyers can spend up to 50 hours per year on approved pro bono matters and receive financial credit for this time). We are constantly looking for ways that we can connect our lawyers with pro bono opportunities that will utilise their skills to make a meaningful contribution to our local communities.

The firm offers pro bono services to many clients aligned with the firm's priorities and positioning. This includes clients such as (this list is not exhaustive):

- Get Real Conscious Impact
- St Vincent's Hospital
- Choice Passion Life (formerly Cerebral Palsy League of QLD)
- Global Centre for Modern Ageing,
- HIV/AIDS Legal Centre,
- Diabetes NSW ACT.
- Arthritis Australia.
- Maluk Timor Australia, and
- Motor Neurone Disease Association Queensland.

The firm also works with a number of structured pro bono referral programs such as Justice Connect and Homeless Persons Legal Service.

### Diversity and inclusion

At TG, we firmly believe in equal opportunity, diversity and inclusion, which is reflected in our Diversity and Inclusion Statement. Diversity is inherent to the way we operate and is core to the success of any business operating in a competitive market.

Across the firm, we have a number of initiatives focused on developing a diverse and inclusive work environment.

We have adopted the Law Council of Australia's Equitable Briefing Policy where we aim to brief women in at least 30 per cent of all matters and pay 30 per cent of the value of all brief fees.

TG is a member of the Australian Network on Disability. Every year we celebrate fundraising and awareness initiatives. As part of our membership of AND we participate in the AND Stepping Into program. Stepping Into is a national internship program that connects university students with disability to workplaces. We are one of only 111 organisations that have provided internships as a part of the program across all types of workplaces and industries.

The firm also has social inclusion policies focusing on prioritising support for Indigenous Australians including through our purchase of promotional products from an Indigenous owned organisation and pro bono work for organisations supporting Indigenous Australians.

Approved by the Partnership of Thomson Geer and signed with authority of the Partnership of Thomson Geer by:

Adrian Tembel
Chief Executive Partner

29 March 2021