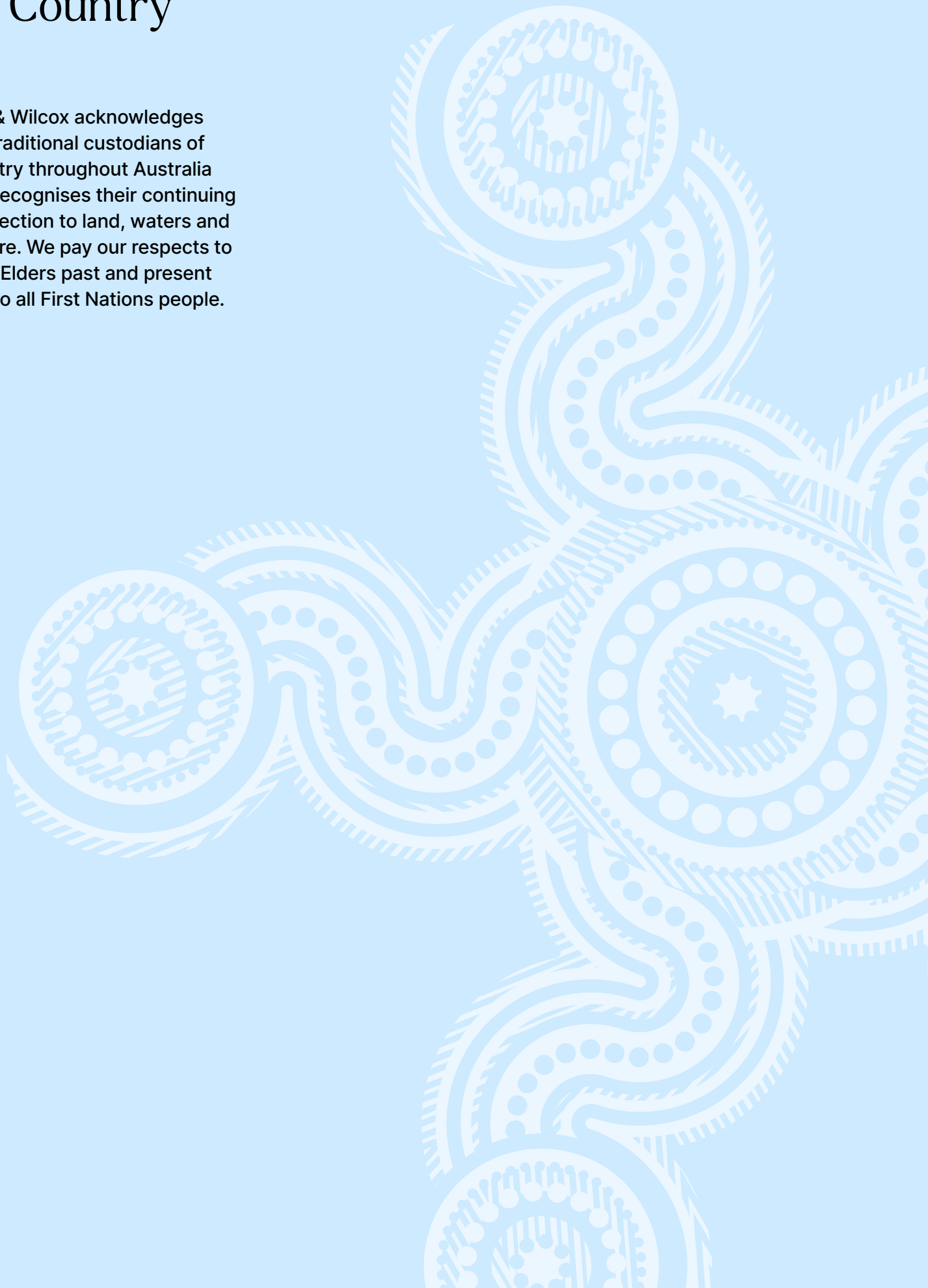


# Hall & Wilcox Modern Slavery Statement FY24

# Acknowledgement of Country

Hall & Wilcox acknowledges the traditional custodians of country throughout Australia and recognises their continuing connection to land, waters and culture. We pay our respects to their Elders past and present and to all First Nations people.



# Introduction

Hall & Wilcox recognises its responsibility to contribute to the elimination of modern slavery and that responding effectively to modern slavery is a process of continuous improvement. This modern slavery statement (**Statement**), our fifth, shows how we are strengthening our response to modern slavery risks, and doing so in concert with our other efforts to achieve ambitious goals related to people and the environment. Our approach aims to be consistent with the UN Guiding Principles on Business and Human Rights (**UN Guiding Principles**).

This Statement has been prepared in respect of the year 1 July 2023 to 30 June 2024 (**Reporting Period**). It is made pursuant to the mandatory reporting criteria in section 16 of the *Modern Slavery Act 2018* (Cth) (**Act**). The table below identifies where each criterion of the Act is addressed in this Statement:

Mandatory criteria for modern slavery statements	Page of this Statement
Identify the reporting entity	3
Describe the reporting entity's structure, operations and supply chains	4 - 7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	8 - 9
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address those risks, including due diligence and remediation processes	10 - 12
Describe how the reporting entity assesses the effectiveness of these actions	13
Provide any other relevant information	13
Describe the process of consultation with any entities the reporting entity owns or controls	13

## Reporting entity

Hall & Wilcox (ABN 58 041 376 985) is a reporting entity under the Act. This Statement is made in accordance with section 13 of the Act on behalf of the partnership of Hall & Wilcox and the entities it controls, being Francis Gillman Pty Ltd as trustee for the Francis Gillman Unit Trust (**Francis Gillman**), Francis Gillman Finance Pty Ltd as trustee for the Francis Gillman Finance Trust, Francis Gillman Holdings Pty Ltd and H&W Nominees Pty Ltd (**Associated Entities**).

# Our structure

Hall & Wilcox is a leading Australian law firm with offices in Melbourne, Sydney, Canberra, Newcastle, Brisbane, Perth, Darwin and Adelaide.<sup>1</sup> We are a firm of over 1100 people, including 146 partners. We build partnerships with and deliver outstanding legal services to corporate, public sector and private clients, both Australian-based and those offshore doing business in Australia. Our success depends upon the success of our clients, our people, and the communities in which we work and live.

Our core practice areas are: Banking and Financial Services, Corporate and Commercial, Litigation and Dispute Resolution, Employment, Insurance, Trusts and Estate Planning, Property and Projects, Cyber, Privacy and Data Protection, Environmental, Social and Governance (**ESG**) and Tax. We also have a thriving pro bono and community practice, with a dedicated Pro Bono Partner.

Our commitment to contributing to our communities is embedded in our firm culture. Our pro bono practice embraces our ethical responsibility as a firm to help those in need and enriches the personal and professional lives of the Hall & Wilcox lawyers who get involved.

Our industry focus is on Investment Funds, Healthcare, Government, Retail and Consumer Goods, Social Infrastructure, Technology and Digital Economy, Education and Training, Energy, Sports and Entertainment and Transport and Trade.

<sup>1</sup> The head office of Hall & Wilcox is 525 Collins Street, Melbourne, Victoria 3000

# Our approach

Hall & Wilcox is committed to ESG principles and a sustainable future. Addressing environmental, human rights, modern slavery and other ESG considerations in our operations and supply chains is aligned with our purpose of enabling our clients, our people and our communities to thrive. It is also aligned with our Hallmarks which are our core values and an expression of how we expect our people to go about their work.

By participating in the UN Global Compact (**UNGC**), Hall & Wilcox is committed to implementing the 10 UN Global Compact principles (**10 Principles**) and advising and supporting clients to implement them also. These 10 Principles take into account the fundamental responsibilities of business in the areas of human rights, labour, environment and anti-corruption.

We recognise the real and pressing environmental challenges that we all face, as well as our responsibility to reduce the impact our business has on the environment. We are moving towards becoming a certified carbon neutral business and to make our contribution to Australia's commitment to net zero greenhouse gas emissions (**Net Zero**) by 2050.

The World Bank estimates that by 2050, 216 million people could be compelled to migrate within their countries due to slow-onset climate change impacts without concerted climate and development action.<sup>2</sup> Forced migration increases the risks of human trafficking and forced labour, including in the very industries that are degrading the environment and driving climate change, creating a situation in which climate change drives, and is driven by, modern slavery.<sup>3</sup>

Climate change action may itself be a driving factor, given the emergence of evidence linking clean energy supply chains to modern slavery.<sup>4</sup> Modern slavery and climate change must be addressed together.

## Our Hallmarks



Stay true



Better together



Evolve always



Be remarkable



Respect respect

<sup>2</sup> This statistic relates to the following regions: East Asia and the Pacific, North Africa, Eastern Europe and Central Asia, Sub-Saharan Africa, South Asia, and Latin America: World Bank Blogs: Climate migration - deepening our solution, Simeon Ehui and Kanta Kumari Rigaud, March 22, 2022

<sup>3</sup> <https://www.antislavery.org/what-we-do/climate-change/>

<sup>4</sup> <https://assets.cleanenergycouncil.org.au/documents/resources/reports/Addressing-Modern-Slavery-in-the-Clean-Energy-Sector.pdf>

# Our operations

Hall & Wilcox is a professional services business which predominantly employs professionally qualified and highly skilled people. We have a well-established human resources framework of policies and procedures to ensure compliance with labour laws and regulations and with our core values.

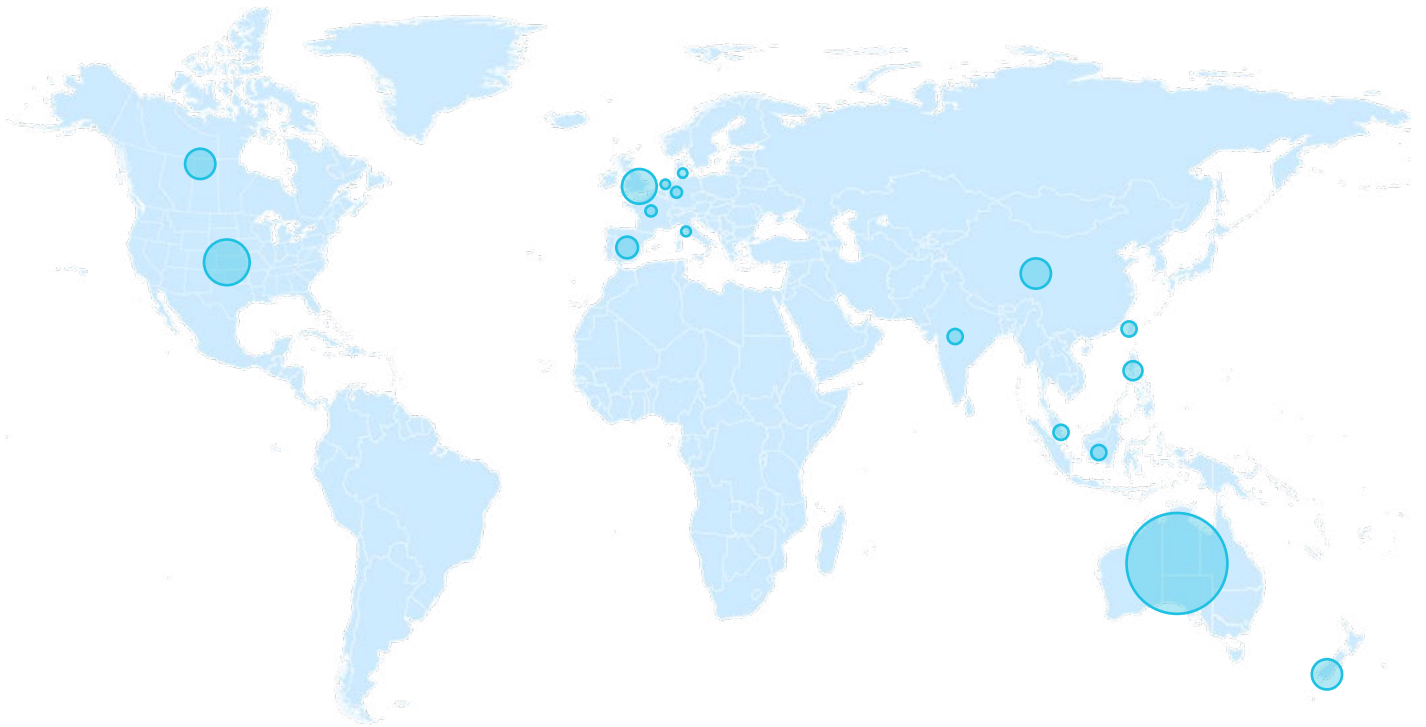
The conduct of our lawyers is regulated by legal profession legislation in each jurisdiction in which we operate, so we consider the risk of causing modern slavery in our operations to be very low.

Francis Gillman provides administrative and support services to Hall & Wilcox and employs all non-legal staff. Corporate Services roles in our operations (including IT, People & Culture, Finance and Operations) are also considered low risk due to their location within Australia and our commitment to operating in compliance with our human resources framework.

# Our supply chains

Our supply chains consist of products and services procured to enable our people to deliver our services. Our procurement is decentralised, with purchasing control granted to departments and to a lesser extent local offices.

The location of suppliers who completed our modern slavery and human rights questionnaire is shown on this map:



## Our main categories of procurement



Rental, Hiring and Real Estate Services



Information Technology (including professional services)



Accommodation, Food and Entertainment



Memberships and Subscriptions



Facilities Management and Property Maintenance



Motor Vehicles and Travel



Professional and Technical Services



Retail Trade

# Our risk areas

## Operations

Hall & Wilcox considers the risk of modern slavery in our operations to be very low due to our commitment to operating in compliance with our human resources framework (as described under 'Our operations').

We are conscious that if any of our clients are associated with modern slavery in their operations or supply chains, we could be linked to such practices through the provision of our legal services to the clients.

## Supply chain

While most of the products and services we procure are from suppliers with headquarters and/or operational facilities in Australia or other countries with a low risk of modern slavery, we recognise that there is a risk that we, like other businesses, may be directly linked to the modern slavery practices of individuals and entities deep within our supply chains, including those with which we do not have a direct contractual relationship.

We have not identified any specific instances of modern slavery and our analysis has found that most tier one suppliers pose a low overall risk of modern slavery. Where suppliers were connected to an industry/sector and products/services associated with higher modern slavery risk, the risks were mainly associated with the following categories:

## Information technology – hardware and services

We procure electronic goods and IT support and consulting services directly and through suppliers who procure these goods and services on our behalf. Our laptops and monitors are sourced from multinational companies whose modern slavery statements we review as part of our due diligence process.

Modern slavery risks are most pervasive in the raw material extraction and manufacturing stages that are known to attract vulnerable populations in high-risk countries. Our visibility of risks relies on suppliers providing information on their standards and risk management and compliance systems.

## E-waste

E-waste is any discarded product with a plug or battery. It is a health and environmental hazard containing toxic additives or hazardous substances.

The Global E-waste Monitor 2024 estimated that 62 million tonnes of e-waste was produced in 2022. Less than one quarter of this e-waste reached formal waste management or recycling facilities.<sup>5</sup> Significant amounts of e-waste are suspected to be shipped overseas and processed using exploited labour in unsafe conditions.

Hall & Wilcox seeks out reputable service providers to recycle or dispose of e-waste.

<sup>5</sup> The global E-waste Monitor 2024 – Electronic Waste Rising Five Times Faster than Documented E-waste Recycling: UNITAR



# Our risk areas

## **Rental, Hiring and Real Estate Services, Facilities Management and Property Maintenance**

Cleaning, security, waste, property maintenance and building operations services are procured by the managers of the larger offices we lease. For our smaller offices, many of these services are procured directly by us.

Labour exploitation in the cleaning industry is well documented. A combination of factors heightens the risk of modern slavery, including the high demand for base-skill labour, reduced visibility of labour standards due to outsourcing, and workers from vulnerable populations, including migrant, low socioeconomic or culturally and linguistically diverse backgrounds.

The cleaning service engaged by our building managers in Sydney (for part of the Reporting Period), Brisbane and Perth, and which we engage directly for additional cleaning regimes, is a participant in the Cleaning Accountability Framework (CAF), a multi-stakeholder initiative which seeks to improve labour practices in the cleaning industry. The cleaning services engaged by our building managers in Melbourne and Adelaide have achieved CAF 3 Star Prequalification status.

## **Construction**

Construction was not a main category of procurement in the Reporting Period. However consideration was given to the higher modern slavery risks associated with

the industry in preparation for our move to new offices in Melbourne and Newcastle (see Melbourne office case study **below**).

We recognise that factors that heighten the risk of modern slavery in this category include the subcontracting of base-skill labour. Sourcing raw materials and goods from overseas often involves high risk countries and multi-tiered supply chains, resulting in limited visibility of modern slavery risks.

ESG considerations are a key priority of our national premises strategy endorsed by the Board of Partners.

## **Accommodation, food, entertainment**

This category includes hospitality and catering used for our events. We must consider that providers in this sector may rely on labour procured through outsourcing arrangements and may involve workers from vulnerable backgrounds.

Food industry supply chains have a high risk of modern slavery. In September 2024, the NSW Anti-slavery Commissioner released a report addressing the emerging modern slavery risks in the NSW agriculture, horticulture and meat processing industries among temporary migrant workers, particularly Pacific Australia Labour Mobility workers. It includes information suggesting a pattern of conduct involving indicators of forced labour, debt bondage, deceptive recruiting and emerging labour trafficking.<sup>6</sup>

## **Manufacturing – primarily associated with retail trade**

Our procurement in this category includes branded products and merchandise for events and internal use. While our suppliers are Australian based businesses, modern slavery risks may exist within the supply chains of the products that we buy, with evidence of human rights issues in apparel manufacturing and a lack of visibility of how suppliers or agents manage these issues.

As in all areas, Hall & Wilcox aims to work with key suppliers who can demonstrate their adoption of safe and fair employment standards and practices.

<sup>6</sup> Be Our Guests: Addressing urgent modern slavery risks for temporary migrant workers in rural and regional New South Wales, Office of the NSW Anti-slavery Commissioner, September 2024

# Our actions to assess and address potential modern slavery risks

## Modern slavery working group

Our modern slavery working group is responsible for determining and implementing our modern slavery response. It includes our Chief Operating Officer, General Counsel, Pro Bono Partner, Director of Technology, Head of Workspace, Head of Projects, National Operations Manager and Risk team members, and draws on a range of expertise across the firm, with key actions managed by respective group members.

## Modern slavery and human rights questionnaires and due diligence

During the Reporting Period questionnaires were sent to 109 suppliers to assist us with our modern slavery and human rights risk assessments of our suppliers. The questionnaires are part of our sourcing process for new suppliers and ongoing due diligence of existing suppliers identified to be at a higher risk of modern slavery.

Suppliers are asked a range of questions, including if they have assessed whether their business has or is causing, contributing, or is linked to adverse human rights impacts and if they have adequate policies, controls, procedures and training designed to prevent, detect, assess, manage and remedy modern slavery in their operations and supply chains.

The following five key indicators are used to assess a supplier's modern slavery risk:

1. country of operations/headquarters;
2. industry;
3. products attributed to a high risk of modern slavery;
4. workforce characteristics; and
5. risk-mitigating measures specific to individual suppliers,

in order to provide an indicative modern slavery risk rating of high, moderate or low.

Our questionnaire was expanded in the Reporting Period to provide more visibility of a supplier's operations and supply chain, including with regard to the engagement of workers and the sourcing of raw materials.

Of the 109 suppliers who were sent a questionnaire:

- 61% of suppliers (67 suppliers) completed the questionnaire;
- eight suppliers provided their FY23 modern slavery statement instead; and
- ten suppliers commenced the questionnaire but did not complete it by 30 June 2024.

We have reviewed the modern slavery statements provided to us, and those of non-responders who have published modern slavery statements to confirm that these suppliers have measures in place or are developing measures to manage modern slavery risks.

We engage further with suppliers who did not respond to the questionnaire as part of ongoing supplier management and will continue to use contract renewals as an opportunity to seek outstanding responses.

As in previous reporting periods, most suppliers who completed the questionnaire were assessed to be at a low risk of modern slavery and no supplier was assessed to be at a high risk. The suppliers assessed to be at moderate risk operated predominantly in the Facilities Management and Property Maintenance, Information Technology, and Food and Entertainment categories. Guided by the results of questionnaires, we determine the level of due diligence we undertake.

Where further monitoring or specific action is considered appropriate, we will put in place a program to foster collaborative efforts to address potential risks. In this Reporting Period we made available our supplier modern slavery awareness training module to seven suppliers with a moderate risk rating who indicated to us in questionnaire responses that their workforce had not completed training on human rights related issues.

With regard to cleaning services, we considered the risk assessments and/or modern slavery statements of our building owners, building managers and cleaning services (where available), and their engagement with the CAF certification process. Our action plan relating to our cleaning services is leading us to look deeper into our supply chain and the underlying drivers of risks, and to address these risks.

**Melbourne office case study - Queen & Collins Tower, 376-390 Collins Street, Melbourne**

Hall & Wilcox's Melbourne office is moving to Queen & Collins Tower in January 2025.

During the Reporting Period, the landlord of Queen & Collins Tower (which is also the building manager) completed our modern slavery and human rights questionnaire, as did our construction manager and designer. They are all reporting entities under the Act.

Queen & Collins Tower is a CAF 3 Star Certified Building. The cleaning service engaged by the landlord (which is the same cleaning service engaged by our current Melbourne building manager) has achieved CAF 3 Star Contractor Prequalified status. It directly employs all its cleaning staff, giving it greater oversight of modern slavery risks in this aspect of its business than if it used indirect labour. Its tier 1 supply chain consists of local suppliers who source their materials and products from many countries, with most of its tier 2 suppliers located in the UK, USA, Europe and China.

We are pursuing Green Star<sup>7</sup> and WELL<sup>8</sup> certifications for our office fit-out with the assistance of an ESG consultant as part of our Net Zero strategy and our commitment to the health, safety and wellbeing of our people. Our Green Star work complements our modern slavery due diligence efforts and addresses climate change and modern slavery together.

Through our Green Star work, we assess the social and environmental sustainability credentials of the products and materials used in office fit-outs, either at an aggregate level via a lifecycle assessment (which provides a broad, holistic view) or via a Sustainable Products Calculator which looks at granular metrics of each product included in the project. Examples include:

- verifying certifications such as the Declare Label through which manufacturers provide detailed information about the material composition of a product and the responsible sourcing of those materials;
- checking Forest Stewardship Council (FSC) certificates for timber products, which also considers the people who are working in the forests within scope of the FSC label; and
- checking environmental product declarations, which also look at social impacts.

Products selected tend to be those that have applied for and met a level of sustainability certification, indicative of the manufacturer's commitment to supporting human and environmental health. A lifecycle analysis of materials used in our Queen & Collins Tower office fit-out is in progress and will give us visibility into further tiers of our supply chain.

<sup>7</sup> Green Star certification is a formal process managed by Green Building Council of Australia during which a building, fit-out, or precinct is awarded a rating by an independent, third-party assessor.

<sup>8</sup> The WELL Building Standard (version 2) was developed by the International WELL Building Institute. WELL measures attributes of buildings that impact occupant health. WELL is composed of over one hundred Features that are applied to each building project, and each WELL Feature is designed to address issues that impact the health, comfort or knowledge of occupants.

### **Policies, processes and templates**

Our procurement policy references all policies, processes and guidelines relating to procurement, including the social and sustainable procurement policy. It sets out the firm's processes around ESG-related risk assessments, including the modern slavery and human rights risk assessment, further supplier due diligence, and the reporting and remediation of modern slavery incidents (existing and forthcoming).

It provides that approval of a supplier may be conditional on the inclusion of contractual provisions giving the firm rights and assurances with respect to modern slavery that are commensurate with the risk presented. Alternatively, supplier agreement templates may be used which incorporate modern slavery controls for our suppliers and their supply chains.

### **Training**

Our mandatory modern slavery awareness module, part of our induction program for all new starters, aims to develop awareness of how we all intersect with modern slavery in our daily lives. It covers the following topics:

- what is modern slavery and the Act
- the firm's response to the Act; and
- what each of us can do to help eliminate modern slavery.

During the Reporting Period we started additional modern slavery and human rights training for key people, including those involved in procurement. This training draws on our learnings from the UNGC Business & Human Rights Accelerator programme and includes

the cause, contribute and direct linkage framework in the UN Guiding Principles. This was a proposed action in our FY23 modern slavery statement.

### **External engagement and other activities**

Our Business & Human Rights practice, part of our Employment practice, provides advice and representation to enable businesses, non-profit and public sector entities to comply with all of their legal obligations in all areas relating to human rights, including working with clients at various stages of the modern slavery reporting cycle. Our pro bono practice also provides specialist advice on human rights law to a variety of clients, including non-profit entities.

The firm prepared the following reports during the Reporting Period:

- our annual ESG report which covers the steps we have taken as a firm in the areas of environment, governance, anticorruption, human rights and labour, including modern slavery;
- our first UNGC Communication on Progress, detailing our work to embed the 10 Principles into our strategies and operations; and
- as a member of the Australian Legal Sector Alliance, we report annually on topics including sustainable supply chain management.

We also responded to modern slavery questionnaires issued to us by numerous clients as part of their own modern slavery and human rights risk assessments.

# How we assess the effectiveness of our actions

To assess the effectiveness of our actions:

- we compared the response rate to questionnaires for the current and previous reporting period: 61% of suppliers (67/109 suppliers) completed the questionnaire, compared to 66% (59/90 suppliers) in the last reporting period;
- we assessed our suppliers against our risk framework to determine their risk profile/rating;
- we compared questionnaire responses and risk ratings for the current and previous reporting periods for changes in the risk profiles of suppliers and any associated trends, and again identified some areas where we will work with the supplier on modern slavery awareness;
- we monitored the completion rate and feedback on modern slavery training for our people and the number of modern slavery awareness modules that we make available to suppliers; and
- we will continue to develop measures to assess the effectiveness of our actions as further social procurement and modern slavery initiatives are implemented.

## Other relevant information - our next steps

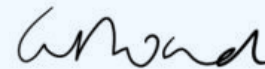
Hall & Wilcox is taking a continuous improvement approach to combatting modern slavery, including the following immediate and longer term actions:

- follow up various suppliers who did not respond to the request to complete the questionnaire as part of ongoing supplier management;
- identify suppliers requiring further due diligence and develop a program with suppliers to address potential risks, as required;
- expand our identification of potential risks of modern slavery for suppliers in tier 2 and further down the supply chain;
- expand the modern slavery controls for our suppliers and their supply chains;
- adopt a human rights statement and broader human rights due diligence framework;
- implement a human rights grievance mechanism as part of our process to enable remediation;
- continue to regularly review our policies and processes; and
- continue to provide further modern slavery and broader human rights training to key people, including those involved in procurement.

## Consultation and Board approval

This statement was prepared by our Risk team in consultation with our broader Modern Slavery Working Group, relevant Corporate Services heads and our Pro Bono Partner. The process was inherently consultative due to the shared management and governance of the partnership and Associated Entities.

This statement was approved by the Board of Partners of Hall & Wilcox on 10 December 2024.



**Graydon Dowd**  
Managing Partner



**Emma Woolley**  
Chair of Partners

Creating value for clients.