

Modern Slavery Statement 2022

13 December 2022

Introduction

This Modern Slavery Statement has been prepared by Dentons Australia Limited in accordance with the *Modern Slavery Act 2018 (Cth)* requirements. This statement relates to our activities during the 2022 financial year, from July 1, 2021 to June 30, 2022 and was approved by the Board of Directors on 13 December 2022.

The purpose of this statement is to outline Dentons' approach to ensuring that our organisation has in place the appropriate policies, processes, and frameworks to identify, assess and mitigate modern slavery risks in our business operations and supply chain.

We recognise the suffering which modern slavery causes and that it has no place in today's world. In an increasingly global marketplace, we recognise that all businesses have a responsibility to understand whether modern slavery is taking place within their supply chains and take any necessary actions to remove unlawful or unethical practices. This is a responsibility we take seriously.

Dentons is committed to the highest ethical business standards and expects the same of our business partners and supply chain. Modern slavery in any form will not be tolerated in our business or those that we do business with.

Our business

Dentons Australia Limited (**Dentons**) is an incorporated legal practice providing legal services to businesses and individuals in Australia and Papua New Guinea.

Dentons has offices in Sydney, Melbourne, Brisbane, Adelaide, and Perth in Australia, as well as Port Moresby in Papua New Guinea.

Considering the nature of our professional services and the requirement that our employees must adhere to professional conduct standards in the jurisdictions we operate, we consider that the risk of modern slavery in our local operations is very low.

Our supply chain

Dentons supply chain consists of those entities that support the provision of our legal and professional services across the country.

Our supply chain includes leases for the properties we occupy, catering and cleaning services, some outsourced business process services, recruitment and employment agencies and the purchase of goods including office furniture and supplies, IT software and hardware. The vast majority of goods and services sourced by Dentons are provided by entities within Australia however we acknowledge that some local suppliers may also have international supply partners. As this may increase the risk of modern slavery, we are dedicated to identifying the origin of these goods and services.

Our policies and procedures

Our commitment to ethical and legally compliant business practices has seen Dentons implement a range of policies and procedures designed to mitigate our exposure to modern slavery and human rights risks. Our approach begins with our employment practices, sourcing the highest calibre of candidates who undertake a comprehensive onboarding program that covers the high expectations we have for business practices within the organisation.

Our internal policies include those relating to ethical work practices, procurement and supplier due diligence, social impact, whistle-blower protections and supplier code of conduct as set out in our Modern Slavery Policy. All policies are reviewed and updated at a minimum on an annual basis.

Assessment of modern slavery risks

Dentons continues to assess risk and carry out due diligence on all relevant and appropriate suppliers by asking for information on their policies and specific questions designed to identify modern slavery risk. This helps us to establish what measures and potential mitigation suppliers have in place. The information and the output are used to understand our exposure to modern slavery risks. This process is designed to assist our organisation to continue to develop strategies to mitigate current and future risks. Our assessment takes into account the primary modern slavery risk indicators including the goods and services supplied, high risk sectors or industries, geographic and entity-specific risks.

Our suppliers that present a higher level of risk are required to complete a modern slavery questionnaire with the aim of gaining further insight into the second or subsequent tiers of our supply chain. Those who have been identified as lower risk are informed of our commitment to the eradication of modern slavery and are provided with opportunities for further engagement.

Our supplier code of conduct has been designed to share our procurement principles with our suppliers and to clearly communicate the behaviours and business practices to which we expect suppliers to adhere.

Our actions

During FY21/22 we carried out the future actions proposed in our FY21/22 Statement and our FY22/23 planned actions are as follows:

Proposed action in FY21/22 outcomes	FY22/23 planned actions
<p>We improved our supplier due diligence practices through a more comprehensive supplier onboarding process that captures and assesses relevant organisational information.</p> <p>The information capture process was rolled out to the balance of our existing suppliers allowing us to build a comprehensive risk profile across our supply chain.</p>	<p>Continue to improve our supplier due diligence practices through a comprehensive supplier onboarding process that captures and assesses relevant organisational information. We will also continue to build a comprehensive risk profile across our supply chain.</p> <p>Dentons will further enhance our due diligence practices on technology companies, with a focus on those who have identified offshore component manufacturers in their supply chains.</p>
<p>Contractual terms have been made available to provide a baseline for our future supplier engagements.</p>	<p>We will further look at implementing an online application to help us to ensure end to end risk assessment and better manage our data.</p>
<p>A new Procurement Policy was developed and implemented.</p>	<p>Continue to identify and implement improvements in our supplier procurement engagements to address modern slavery risk through our Modern Slavery working group described below.</p>
<p>Education of our employees via internal training modules and our suppliers through regular communication was conducted and further entrenchment of the program into the culture of our organisation and those we work with.</p>	<p>Continue to roll out our internal online training annually to all existing staff and ensure all new staff complete the training through our induction program.</p>
<p>These education and communication mechanisms allowed Dentons to proactively manage any actual or emerging rights risks in a coordinated way with our suppliers.</p>	<p>Continue to educate our suppliers of our commitment to addressing modern slavery risks by offering our suppliers access to our online training module.</p>
<p>We developed a training module for staff to be accessed on our internal online training platform and have made this training compulsory for all existing staff and through our induction program for new staff from June 2021.</p>	<p>Establish a Modern Slavery working group who will develop a 3-year action plan. This will help us to better measure the effectiveness of our strategy and continuously review our priorities and performance. The working group will:</p> <ul style="list-style-type: none"> • Undertake an annual review of our modern slavery risk assessment methodology • Review existing policies concerning modern slavery to ensure they continue to mitigate our

Proposed action in FY21/22 outcomes	FY22/23 planned actions
	<p>exposure to modern slavery and human rights risks</p> <ul style="list-style-type: none"> • Share new developments in modern slavery reporting under the Modern Slavery Act 2018 • Ensure any identified risks and concerns are brought to the attention of senior personnel and a response plan is followed.
<p>Training of the Dentons Board around the Modern Slavery risks and reporting requirements was undertaken.</p>	<p>Provide updated training to the Dentons Board about modern slavery risks in our supply chain.</p>
<p>The draft policy was not approved by the Dentons Board during this reporting year but we will have it approved in FY22/23. The policy provides a guideline for our complaints, grievances, and remediation process to ensure we respond appropriately to any perceived, actual, or emerging Modern Slavery risks.</p>	<p>Dentons Board to approve draft Modern Slavery policy developed in FY21/22</p>

Measuring our effectiveness

Our enhanced procurement and supplier due diligence process Dentons has enabled Dentons to track the progress of our modern slavery program via the engagement of our suppliers, the number and timeliness of responses to our queries and feedback on our supplier code of conduct.

Dentons can now measure our program’s effectiveness through our employee’s completion rate of training modules as well as their ability to confidently challenge and educate our suppliers.

With the formation of the Dentons Modern Slavery Working Group this financial year we will be able to meet to measure the effectiveness of our strategies and review our priorities and performance and continue to make improvements in Dentons engagement with our suppliers.

Consultation within our group

All entities owned or controlled by Dentons Australia Limited have been included in our risk-based approach to the identification, assessment, and mitigation of modern slavery risks. They have been made aware of the actions they need to take and will be developing their frameworks, policies, and procedures in line with the emerging Australian and international legislation in this space.

Approval



Doug Stipanicev
Australasia Region CEO
 Dentons Australia Limited