



Wherever our clients need us, that's where we are.

# Modern Slavery Statement

Sparke Helmore

1 July 2021 – 30 June 2022

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**Andrew Davis**

Head of Internal Legal and Risk

+61 2 9260 2504

+61 413 609 853

[Andrew.Davis@sparke.com.au](mailto:Andrew.Davis@sparke.com.au)

This Modern Slavery Statement (**Statement**) is made on behalf of Sparke Helmore Lawyers (ABN 78 848 387 938) and its controlled entities, including Spamil Pty Limited (as trustee for the Spamil Discretionary Trust) (ABN 59 828 738 349 (together referred to as “Sparke Helmore”, “we”, “us” and “our”).

## Introduction

Sparke Helmore recognises that modern slavery includes trafficking in persons, slavery, slavery-like practices (including forced labour, forced marriage and debt bondage) and the worst forms of child labour, and that modern slavery can occur in any country, sector, or industry. Sparke Helmore opposes modern slavery in all its forms and does not tolerate any form of slavery or human trafficking in our business or our supply chains.

Our strategies and processes to address modern slavery in our supply chains have been developed and reviewed by our senior operational team leaders, including Office Services, Human Resources, Information Technology and Internal Legal and Risk and Compliance to ensure that we take a coordinated approach across our business. These processes include a commitment to continuous improvement.

## Reporting period 2021/2022

This is the second Modern Slavery Statement for Sparke Helmore under the *Modern Slavery Act 2018* (Cth). It covers the reporting period 1 July 2021 to 30 June 2022 and was approved by the Sparke Helmore Board on 22 May 2023.

Over the course of the second reporting period, Sparke Helmore experienced no actual or suspected cases of modern slavery in its operations or supply chains.

## Purpose

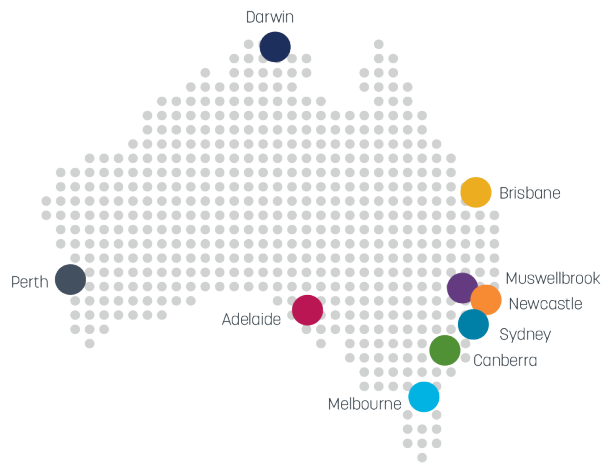
The purpose of this Statement is to outline Sparke Helmore’s continuous commitment to identifying and understanding the risks of modern slavery and human trafficking in our operations and supply chain. The Statement reinforces the steps we have taken over the last reporting period, to implement robust frameworks and processes to minimise these risks.

Through the measures we take we hope to continue to contribute to a global reduction in modern slavery and human trafficking.

## About Sparke Helmore

Sparke Helmore Lawyers is an Australian partnership and law practice delivering legal services. Sparke Helmore currently operates in Australia across nine offices and all states and territories other than Tasmania.

Spamil Pty Ltd is the trustee of the Spamil Discretionary Trust, which provides administrative and support services to the other Sparke Helmore businesses. Further information about Sparke Helmore can be found on our website here: [www.sparke.com.au](http://www.sparke.com.au).



The Chair and the National Managing Partner of Sparke Helmore Lawyers are directors of and control Spamil Pty Limited. The operations of all Sparke Helmore entities are delivered and overseen by the same people. All Sparke Helmore entities have been consulted in the preparation of, and have endorsed, this Statement.

### Sparke Helmore’s values

Sparke Helmore is committed to the highest standards of professionalism, ethical behaviour, and integrity in everything we do. We have a zero-tolerance approach to all human rights abuses.

Sparke Helmore is a values-driven business that strives to:

	put our clients at the heart of everything we do
	always be authentic, ethical and behave with integrity and respect
	enable people to be their best
	be open to change, adapting to challenges and uncertainty
	work collaboratively towards achieving our goals, and
	lead by example.

## Sparke Helmore's operations and supply chains

As a law practice, Sparke Helmore is a professional services business that predominantly employs professionally qualified and highly skilled people. We comply with all employment and workplace-related laws and to the highest standards in each of the jurisdictions we operate in and from.

As a professional services business our supply chain primarily consists of services, and some physical goods, that we procure to assist our people to deliver our services.



We use only reputable suppliers, most of which are based in Australia and are subject to Australian law. Of our international suppliers, most are large, leading global brands that primarily supply Sparke Helmore with knowledge and subscription services, insurance, and information communications technology, and are subject to laws that have at least equivalent anti-slavery and human trafficking laws to Australia.

## Impact of COVID-19 pandemic on supply chains

The effects of the COVID-19 pandemic in 2021/2022 had only a limited impact on our supply chains generally, and we found no identifiable effects on the modern slavery risks. During the COVID-19 lockdowns, our people were able to continue to seamlessly and safely deliver our services from their home using the same technology solutions already implemented for flexible working arrangements, scaled-up to enable everyone to work flexibly at the same time. We were then able to continue flexible working arrangements following this period, taking into consideration individual concerns of returning to the workplace and vaccination requirements for our workplace.

## Sparke Helmore ethical framework

Sparke Helmore has a long and proud commitment to the highest standards of ethics and integrity in all that we do, and our approach to modern slavery risks is consistent with that approach. We recognise that our reputation rests on how we conduct ourselves individually and collectively as a business. We have a suite of policies that reinforce how we do business in the right way, including:

- **Code of conduct** — sets out how we expect our people will conduct themselves and live our values – individually, in working with colleagues and clients, and when engaging with the broader community.
- **Fraud and Corruption Control Framework** — sets out how we do not tolerate acts of fraud, bribery or corruption of any kind, and the expectations we have regarding the acts of our people, and also the agents, consultants, and contractors with whom we work.
- **Work Health and Safety Policy** — demonstrates our commitment to provide a safe environment for workers and visitors
- **Workplace Gender Equality Policy** — seeks to advance and promote gender equality in all our activities and embed it in our culture
- **Diversity & Inclusion Strategy** — encourages all our people to value diversity and respect each person's individuality and other aspects of identity such as gender identity, religion, racial background, disability, sexual orientation and ethnicity.
- **Corporate Social Responsibility Policy** — sets out how we seek to ensure our business is sustainable over time and that we have a positive impact on our people, our clients, and the community.
- **Environmental Policy** — describes our commitment to the principles of sustainable development and our intention to promote these principles and best practice environmental management.
- **Conflicts Policy** — sets out the imperative that our business adheres to the highest standards when managing conflicts of interest, both for our business and also our people where there may be a conflict with their own personal interests, and also a Personal Interests and Dealings in Securities Policy.
- **Performance Management and Disciplinary Policy** — deals with, amongst other things, any behaviour amounting to misconduct by our people.



## The modern slavery risks in Sparke Helmore's operations and supply chains

We continue to assess the risks of modern slavery in our supply chains to be low, with very few areas having the potential for modern slavery activities, including through our direct suppliers.

We acknowledge that continual vigilance and continuous improvement of our own supply chain risk identification and assessment processes remains pivotal in combatting modern slavery.

Where there is the potential for modern slavery activities these generally involve secondary suppliers to large, multinational companies with substantial business and ethical conduct programmes of their own, including strict anti-slavery requirements for their own supply chains, and subject to strict anti-slavery laws in the various jurisdictions in which they operate. We have continued to not engage smaller, local companies within emerging economies where laws tend to be weaker, and a heightened risk of modern slavery practices exist.

## Actions taken to assess and address modern slavery risks

During our first reporting period, we undertook a preliminary review to better understand and map our supply chain. We focused initially on our major suppliers and the review involved a desktop analysis of our key suppliers where we assessed our supply chains to be of low risk of involvement in modern slavery. Throughout our second reporting period we took the same approach to re-assess and ensure our supply chains were of low-risk involvement in modern slavery. Once again, no specific risks were identified as requiring mitigation or remediation.

In our next reporting period, we intend to continue to improve our due diligence and supplier assessment processes to enable us to inquire deeper into our supply chains. Should risks be identified, we will develop strategies to promptly mitigate or remediate those risks, including where necessary to terminate arrangements with non-compliant suppliers.

## Assessing the effectiveness of action taken

We continue to review our policies to ensure that we are adequately addressing operational and supply chain risks, and where necessary update and develop our policies and procedures in response to this review, as well as ongoing monitoring of broader developments relating to modern slavery risk.

We have undertaken an annual review of our procurement processes considering peer best practice and have considered further developments in modern slavery laws and guidance and remain confident that our processes are robust and that there is no modern slavery manifest in our supply chains.

During the next reporting period, we intend to provide updated modern slavery awareness training for our procurement people. Our procurement people are encouraged to provide feedback on our processes and modern slavery training to assist in assessing their effectiveness and areas for improvement.

This program of work will enhance our ability to take appropriate action in response to identified risks, and where modern slavery risks are identified, to escalate as appropriate to our Head of Internal Legal and Risk and our Chief Operating Officer. These two individuals will respond to the identified risk by developing a mitigation and/or management plan considering the specific context and circumstances and, where appropriate, reporting through to the National Managing Partner, Audit and Risk Committee, and the Board. We are pleased to report that there have been no identified risks since our last reporting period.








## Consultation

This Statement has been prepared following consultation with Sparke Helmore's operational leadership team, including Chief Operating Officer, IT Director, Director of Office Services and Premises, Chief Financial Officer, and Head of Internal Legal and Risk, who together oversee operational and procurement activity across all Sparke Helmore entities.



## Future actions

Over the next two reporting periods, we will be reviewing and reinforcing our actions to continue to improve our supply chain risk identification and assessment processes, including:

-  establishing a permanent senior operational working group to assess the modern slavery risks associated with our supply chains
-  reviewing published Modern Slavery Statements of our Australian based suppliers
-  reviewing equivalent published Modern Slavery Statements of our overseas suppliers
-  developing and sending a modern slavery questionnaire to our suppliers to establish a chain of custody assurance that the goods sourced were not exposed to modern slavery
-  introduce into our procurement processes a requirement to seek a modern slavery statement from suppliers before renewing existing contracts or entering into new contracts, and to seek supplier agreement to template contract terms that address modern slavery and other ethical behaviours, including asking suppliers to commit to respecting and supporting international human rights and undertake that they will comply with their obligations under the Modern Slavery Act or any other similar legislation
-  training our people engaged in procurement to increase awareness of modern slavery risks in our supply chains, including secondary and tertiary suppliers to our primary suppliers, and
-  developing a register of modern slavery risks (if any) identified within our supply chain, and implementing a process to investigate such risks, and to report those to Sparke Helmore's Audit and Risk Committee.

## Board approval

The Boards of Sparke Helmore Lawyers, and Spamil Pty Limited approved this statement on 22 May 2023.



Signed by Roland Hassall

Chair, Sparke Helmore Lawyers



