

Corrs Chambers Westgarth

Modern Slavery Statement

July 2019 – June 2020

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CORRS
CHAMBERS
WESTGARTH

Policy Statement

Society is justifiably demanding that businesses do better. We take active steps to ensure that our people, and any who may provide services on our behalf, do so ethically and responsibly.

We believe that by actively working to identify, prevent and mitigate adverse human rights impacts in our own business and with our clients, we can contribute to a better, more sustainable future. We pride ourselves on working together with our people, our clients and our communities to promote human rights, well beyond regulatory compliance.

We endorse and support international human rights in our workplace, and with our clients. We are a member of the world's largest corporate responsibility initiative - the United Nations Global Compact. We actively promote and respect human rights, and support the Compact's Ten Principles on human rights, labour, environment and anti-corruption, as well as the Sustainable Development Goals.

We stand against modern slavery in all its forms and we are committed to identifying, assessing and addressing risks of modern slavery in our supply chains and operations and assisting our clients to do the same.

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Contents

Reporting entity page 2

About Corrs page 3

Our supply chain page 4

Assessing our risks page 6

Actions to be taken page 8

Are we making a difference? page 10

Future endeavours page 11

Consultation page 12

Approval page 13

Reporting entity

This modern slavery statement is made on behalf of the Corrs Group in compliance with the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). The Corrs Group comprises the partnership of Corrs Chambers Westgarth, Corrs Support Services Pty Ltd as trustee for the Corrs Support Services Trust and their respective associated entities including Corrs Chambers Westgarth Papua New Guinea and Orbit Legal Resourcing (**Corrs**).



About Corrs

Corrs is Australia's leading independent law firm. We provide exceptional legal services across the full spectrum of commercial matters, including major transactions, projects and significant disputes, offering strategic advice on our clients' most challenging issues.

With more than 175 years of history and a talented and diverse team of over 1,000 people, we pride ourselves on our client-focused approach and commitment to excellence. Our fundamental ambition is the success of our clients and our people, and this is reflected in everything we do.

We advise on the most significant global matters and connect with the best lawyers internationally to provide our clients with the right team for every engagement. We are also at the forefront of some of the most high-profile public international law matters in our region, assisting governments and corporations with the resolution of highly complex cross-border disputes.

In order to best support our clients, we have offices in Brisbane, Melbourne, Perth and Sydney. We also have an office in Port Moresby, Papua New Guinea.

We are the firm of choice for many of the world's most significant organisations, with our people consistently recognised for providing outstanding client service and delivering exceptional results.



Our supply chain

Corrs' supply chain consists of goods and services that support our legal and professional services across four states and in Papua New Guinea. Our greatest expenditure is in remuneration, and thereafter our supply chain is predominantly related to expenditure that provides the infrastructure, facilities and other support required to enable the delivery of our services: occupancy costs and facilities management, insurance, technology and hardware, travel and hospitality, records and information management services.

We have over 716 first tier suppliers that are mostly based in Australia. However, some of our suppliers source goods or services from overseas, including some jurisdictions that present a higher risk of modern slavery according to the Global Modern Slavery Index¹. While there are some immediate risks of modern slavery in the first tier of our supply chain, it is in the second and subsequent tiers that we anticipate the greatest risks of modern slavery.

The challenges of effecting change the further removed the risks are from the direct supplier relationship are very real. We have worked to put in place policies and procedures that will, over time, help us to interrogate and build our influence along the extent of our supply chain, and we plan to collaborate with others to leverage meaningful change in the future.

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Key supply chain categories:



Facilities



Technology and hardware



Travel and hospitality



Information management



Marketing and merchandise



Financial services



Personnel

1 Global Slavery Index 2018 <https://www.globallslaveryindex.org/2018/findings/highlights/>



Assessing and addressing risks of modern slavery

Acknowledging that the expenditure associated with any individual supplier does not necessarily correlate to the risk of modern slavery that may exist, Corrs has taken a human rights risk-based approach to assessing our supply chain. As such we have used the United Nation Guiding Principles on Business and Human Rights [UNGP] as a framework for identifying modern slavery related risks and any appropriate responses.

Key to the development of our approach was the establishment of a Responsible Business Working Group (RBWG) to guide the process and provide oversight across the firm. The RBWG includes representatives of the partnership, business services, human resources and risk and compliance and meets regularly to ensure work is progressing and to discuss and resolve issues that arise.

The RBWG initiated the establishment of a modern slavery risk assessment process which involved a thorough mapping of the supply chain, categorisation and assessment of suppliers, and initial identification of risk against Corrs' Modern Slavery Risk Matrix (Risk Matrix).

The Risk Matrix assesses suppliers against four key modern slavery risk factors:

- products and services;
- sectors and industries;
- certain geographic risks as indicated by the Global Slavery Risk Index; and
- identification of suppliers whose business and labour practices may be associated with higher risks of modern slavery.

Corrs' supply chain mapping identified all suppliers by category and location. Subsequently, data from the Risk Matrix was overlaid across the mapping results. This led to a clearer identification and assessment of risk that then provided a framework for our engagement with suppliers, and the ongoing development of tools to assess and address modern slavery risks. In this first reporting period, three areas of focus were identified in our supply chain:



Facilities (including cleaning, car parking, security and other services)

Corrs' offices and facilities are one of our most significant expenditures and harbour some of the more salient risks of modern slavery in our supply chain. Cleaning work, in particular, is a high-risk service sector in Australia and elsewhere,² as multiple tiers of contracting often obscure labour conditions, and the low-skilled nature of work opens employment to workers vulnerable to exploitation. We are also focussed on understanding any risks that may be present in other lower-skilled areas of work associated with our offices including those responsible for car parking, and office and plant/ furnishings services.



Marketing and merchandise

Corrs marketing involves printing, the production of promotional goods such as t-shirts or branded stationery and merchandise, and the hosting of events with catering and hospitality services. We are committed to interrogating the origin of goods, and the nature of the workforces used in the production of these goods and services.

² Walk Free Foundation, Submission No 91 to Joint Standing Committee on Foreign Affairs, Defence and Trade, Parliament of Australia, Inquiry into Establishing a Modern Slavery Act in Australia (May 2017) 10–11.



Technology and hardware

Computers and other electronic goods pose risks of modern slavery that are challenging for all modern businesses. Instances of labour conditions amounting to modern slavery in the sector are well documented³ and while producers and manufacturers are working on addressing the risks in their manufacturing operations and supply chains, the challenges remain significant.⁴ In addition to the operational issues in the sector, there are raw material challenges with significant risks of conflict minerals and child labour in the production of critical components such as cobalt. At Corrs, in our training (discussed below) we often use a mobile phone as a symbol of how modern slavery touches our everyday lives. As a professional services firm relying on technology for both communication, and as enablers for us to provide our services, we are constantly reminded of the challenges technology presents. In this instance, assessing the risk of modern slavery is relatively straight forward – addressing that risk is a challenge that in the long term will only be met by global cooperation, coordination and commitment. In the meantime we are approaching our suppliers, interrogating their policies and practices to increase our understanding of the risks in the sector, and of the challenges faced by those producing electronic and technological goods.

Future considerations

In addition to these three categories of suppliers, an area of focus has been on suppliers that outsource either the production of goods or the provision of services, in particular where that outsourcing occurs in higher-risk regions and countries. The lack of transparency and ultimately accountability about workers' conditions and rights that extends along the supply chain is of concern to Corrs, and we remain committed to engaging with these suppliers as a means to assessing and addressing risks of modern slavery that may exist deeper in our supply chain.

The onset of the coronavirus pandemic has led to the exacerbation of a range of human rights and modern slavery risks, and the emergence of others as global labour forces were laid off, businesses dramatically changed the scale of their operations, and job security became increasingly remote. We have been conscious of the need to engage with our suppliers and ensure that the human rights impact and effects of coronavirus on their business operations and supply chains are being incorporated into their response to the virus. As business struggled to understand the impacts of the pandemic on their operations, and in some cases their very survival, engagement has been challenging in this reporting period, but will be taken forward into the next reporting period as a matter of priority.

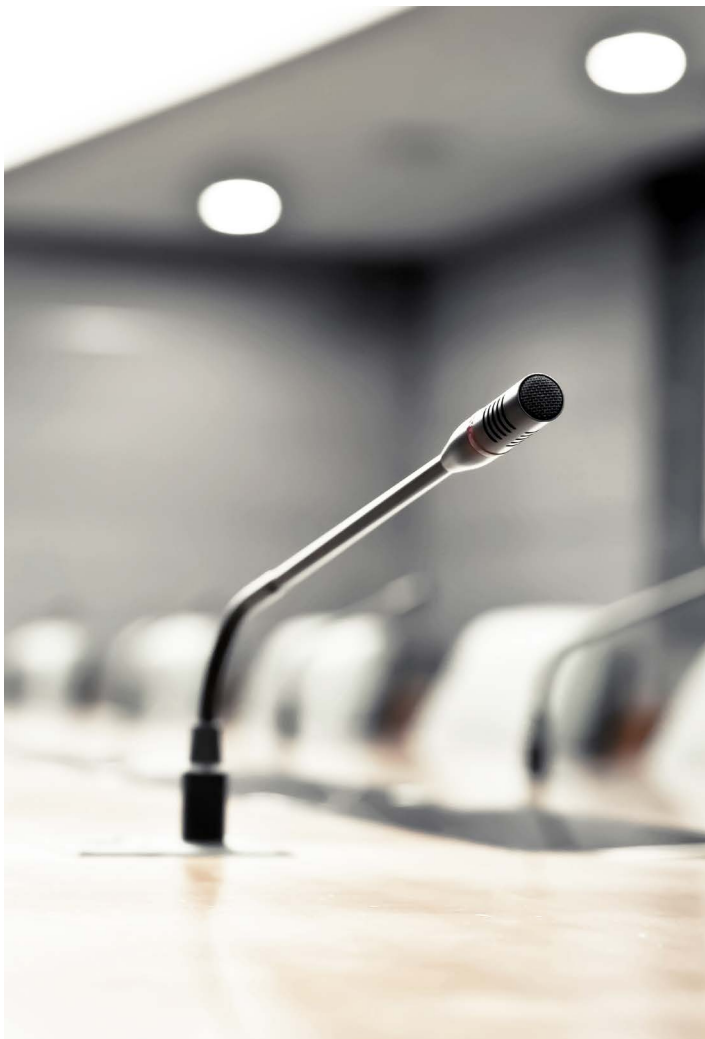
³ See, eg, Verité, *Forced Labor in the Production of Electronic Goods in Malaysia: A Comprehensive Study of Scope and Characteristics* (Report, 2014) <<https://www.verite.org/wp-content/uploads/2016/11/VeriteForcedLaborMalaysianElectronics2014.pdf>>; World Vision, *Tainted Technology: Forced and Child Labour in the Electronics Industry* (Fact Sheet, 2013) <<https://campaign.worldvision.com.au/wp-content/uploads/2013/04/Forced-and-child-labour-in-the-technology-industry-fact-sheet.pdf>>.

⁴ Know the Chain, *Eradicating Forced Labor in Electronics: What Do Company Statements under the UK Modern Slavery Act Tell Us?* (Report, March 2018) <https://knowthechain.org/wp-content/uploads/KTC-ICT-MSA-Report_Final_Web.pdf>.

Actions taken to address risks

Three areas of activity underpinned our efforts to deepen our assessment and enable us to address risks of modern slavery in the reporting period

- **Governance and Management:** Establishing the governance and management structures necessary to ensure we can continually improve in future years.
- **Supplier due diligence:** Engaging with suppliers to gain deeper knowledge of our supply chain risks as part of a coordinated due diligence process.
- **Education and training:** Educating and informing Corrs people, including businesses services team members, so that our procurement and contracting processes are responsive to modern slavery risks in future.



Governance and management

Responsible business working group

The RBWG brings together the Heads of various functions within Corrs including the Head of Employment and Labour; the Head of Business and Human Rights, Partner - Diversity and Inclusion, General Counsel, Chief Operating Officer, Director of Business Development and the Director of People & Performance. The RBWG meets regularly and is responsible for overseeing the firm's modern slavery program.

Policy Review

As modern slavery occurs on a continuum of workplace exploitation and labour violations, key to our due diligence is to ensure that suppliers in our supply chain meet certain minimum standards. A review of Corrs' purchasing and contracting policies was undertaken.

At the same time, we considered how Corrs' supplier sourcing processes could best fulfil Corrs' wider social commitments, including our commitments as members of the United Nations Global Compact Network Australia and our diversity and inclusion strategy (particularly the commitments contained in our Gender Equality Strategy and our Reconciliation Action Plan (indigenous inclusion)).

The former policy framework was updated by the Ethical Sourcing Policy (**Policy**) which contains, as an addendum, Supplier Minimum Standards (**Minimum Standards**). The Policy provides Corrs partners and staff with clear guidance about what they must consider in the procurement process which ensures consistency with Corrs' responsible business commitments in regards to preferred suppliers. The Minimum Standards have been developed to establish the minimum standards required of all Corrs' suppliers, particularly in relation to addressing modern slavery risks.

Contracts and on-boarding

Contracting and supplier on-boarding is one place that modern slavery risks in the supply chain can be mitigated with careful processes and procedures. Corrs changed its contracting process to reflect the new Policy and Minimum Standards ensuring that all new suppliers are asked whether they are able to meet, or work towards meeting the Minimum Standards. Contracts have been strengthened requiring suppliers to assess and address risks of modern slavery in their own operations and supply chains and to notify Corrs if people experiencing situations of modern slavery are identified.



Supplier due diligence

In this reporting period Corrs embarked on a program of supplier due diligence in order to gain a deeper understanding of the risks of modern slavery in our supply chain, and to enable us to have a strong platform from which to address risks in future.

Suppliers of goods and services in the areas of interest identified above - facilities, marketing and merchandise, technology and hardware, and suppliers who may be outsourcing services or the production of goods - have been engaged in a process of consultation. To date, of the 58% of suppliers who have responded, only 61% confirm they are able to meet Corrs' Minimum Standards or are prepared to take steps necessary to meet them. A challenge for the next reporting period will be to engage more deeply with those suppliers who have not responded, and those who have indicated they are unable to meet the minimum standards. Another challenge is the many larger suppliers who have indicated that they are unable to respond to inquiries from individual customers due to the size and scope of their operations.

Education and training

Fundamental to the identification of risks of modern slavery is a clear understanding of how modern slavery manifests in different situations. The eight types of modern slavery identified in the Modern Slavery Act require explanation and Corrs recognised very early that key to a successful risk mitigation program was the education and training of all staff.

An online module in human rights and modern slavery was developed and made part of the suite of mandatory training that is designated to all new employees. In addition, two rounds of face to face training have been provided to practice groups across the firm, and in every State office, as well as in Papua New Guinea.

As policies and procedures were updated, additional training was provided to those responsible for contracting and procuring to ensure that modern slavery due diligence is embedded in our procurement and on-boarding processes.

- During the reporting period 241 members of staff completed the Business and Human Rights and Modern Slavery online training module.
- Corrs' National Legal Excellence Training sessions on Business and Human Rights and the Modern Slavery Act were delivered across 14 practice areas. Training in these sessions focussed on the particular risks of modern slavery in different industries and sectors, and aimed at building the capacity of our legal advisors to work with clients to identify risks of modern slavery where they might arise in certain commercial transactions.
- In addition, Corrs has hosted modern slavery events providing training and insights on modern slavery and human rights with a total of 500 internal and external attendees.

Are we making a difference?

Corrs is committed to a program of continuous improvement to ensure that our efforts to identify, assess and address modern slavery are effective. Over this and the coming reporting period we are focussing on (three) measures to identify how the modern slavery risk measures are being adopted across the firm: training, the effective implementation of our new Policy and Minimum Standards, and the level of engagement and responses we are achieving with our suppliers.

The first measure, and critical to the success of all others, has been to ensure that people across all the firm's offices understand modern slavery risks and the importance of thinking about them in their day to day activities. Our strong online and face to face training programme has been widely adopted, and will be expanded over the next reporting period. In addition we will incorporate knowledge, attitudes and practice evaluations to determine the effectiveness of the training program over the next twelve months.

Second has been the implementation of the new Policy and Minimum Standards, in addition to incorporating the Minimum Standards in new contracts with suppliers. We are already seeing positive anecdotal changes and Corrs people feeling confident to challenge suppliers who initially refuse to engage on our Minimum Standards. This has in some instances resulted in suppliers, after discussion and engagement, agreement to participate and provide commitments to meeting the Minimum Standards. While we acknowledge that contractual commitments do not in themselves amount to due diligence or effectiveness, they do provide a contractual obligation on our suppliers to assist us when we wish to undertake our own investigations into the working conditions in our supply chain.

Third has been our engagement with suppliers we consider to be higher risk. This engagement can only be effective if suppliers are willing to participate and cooperate and where they have shown to be unwilling remains a challenge for us. While response rates to our program of supplier due diligence are still below two thirds, we are committed to ensuring that over the next reporting period we develop more effective means to encourage greater participation in our due diligence processes. We will also continue to work with our suppliers to encourage them to adopt their own modern slavery risk programs.



Future endeavours

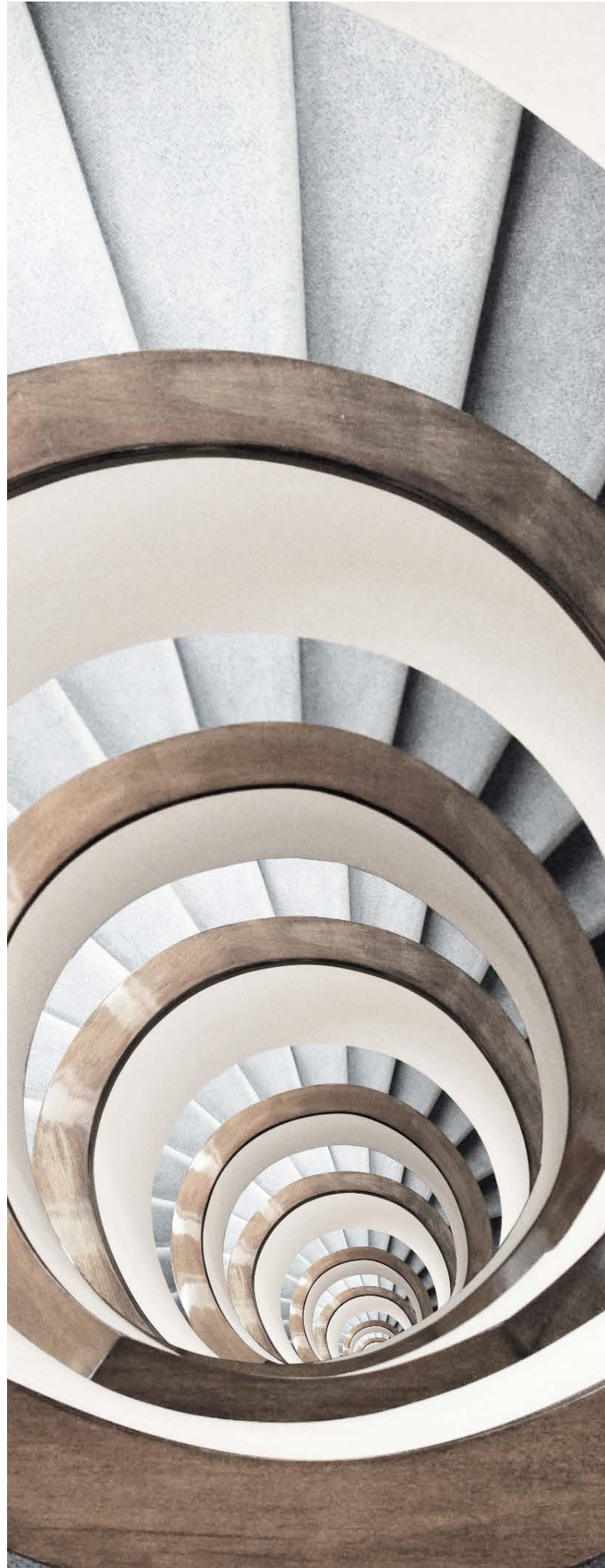
A priority in the next reporting period is to undertake a full review of our existing complaints, grievance and remediation mechanisms and ensure they are fit for purpose when concerns regarding modern slavery risks are raised.

Over the next two years Corrs will continue to expand our due diligence on the high-risk sectors, engage with our suppliers, strengthen education and training of suppliers and our own people, and seek to probe into the second and subsequent tiers of the supply chain. In these efforts we will also have a particular focus on areas of the supply chain in higher risk geographies, including our operations in Papua New Guinea.

Corrs will continue to engage with other interested businesses and organisations to strengthen market responses to modern slavery, support businesses that are not reporting entities to assess and address risks of modern slavery in the supply chain, and to increase understanding of modern slavery across the workforce.

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Consultation

Consultation across the partnership and the Corrs Support Services Trust has been undertaken through the RBWG which comprises members of the partnership, and senior managers and the Chief Executive Officer of Corrs Support Services Pty Ltd.



Approval

Corrs is deeply committed to the elimination of modern slavery in its supply chain and operations, and in the supply chain and operation of our clients. The RBWG continues to guide and develop the anti-modern slavery programme, and our Business and Human Rights practice continues to promote this within the firm, but also in the wider community. By hosting events, seminars, training workshops, and book launches, Corrs has contributed to the ongoing dialogue and education of the Australian business community.

Corrs makes this *Modern Slavery Statement* in accordance with section 14 of the *Modern Slavery Act 2018* (Cth) and constitutes Corrs modern slavery statement for its financial year ended 28 June 2020. This *Statement* has been approved by the Board of Corrs Chambers Westgarth on 21 September 2020 and the Board of Corrs Support Services Pty Ltd on 16 September 2020.



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