

Modern Slavery Statement

Combatting Modern Slavery

This Statement is submitted on behalf of Mills Oakley under section 13 of the *Modern Slavery Act 2018* (Cth) (**MSA**) to cover our fifth reporting period of 1 July 2024 – 30 June 2025.

This year Mills Oakley would like to first and foremost acknowledge the valuable contribution of Moe Turaga, Lived Experience Advisor, in educating our staff on Modern slavery (our time with Mr Turaga is detailed further below). Mills Oakley would also like to acknowledge the courage, leadership and generosity of all lived experience advisors that take on the most crucial role in law reform, policy and practices around Australia in respect of Modern Slavery.

Mills Oakley understands that Modern Slavery practices are violations of human rights and serious crimes. In 2023, the Walk Free Global Slavery Index provided an updated estimate of modern slavery victims worldwide - raising the global estimate from 40 million to 50 million.¹ We are aware that devastating armed conflicts in 2024-2025 have been a contributor to the increased vulnerability of workers around the world. It is clear that the scale of the challenge remains vast and that this issue requires the attention of the global community more urgently than ever.

With the largest portion of the world's forced labour victims and child labour victims being exploited in the Asia-Pacific region, and 86% of forced labour being imposed by the private sector,² Australian markets have a close proximity to Modern Slavery practices both geographically and within the many supply chains of big businesses.

We believe Australian businesses have an obligation to respect, protect and fulfil human rights and fundamental freedoms. This includes identifying, assessing and addressing the risks of Modern Slavery in an entity's operations and supply chains to ensure Australian goods and services are not tainted by Modern Slavery.

Mills Oakley has a proud tradition of assisting vulnerable members of the community to protect their rights. For many years, we partnered with Australia's leading humanitarian law firm to provide pro bono services to disadvantaged individuals. In January 2021, Mills Oakley launched a new charity dedicated to pro bono work - Everyday Justice. Everyday Justice provides free legal advice to people and organisations who cannot access means-tested Legal Aid Services or afford a private lawyer without incurring substantial financial hardship. Everyday Justice acts for free in public interest law matters involving issues such as social or public welfare, human rights, reconciliation, the natural environment and the protection of animals. Everyday Justice has provided free advice and assistance to survivors of modern slavery.

Mills Oakley has every desire to maintain responsible, transparent operations and supply chains and to ensure that we do not cause, contribute to or become directly linked to any instances of Modern Slavery.

¹<https://www.walkfree.org/global-slavery-index/>

² Global Estimates of Modern Slavery, International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM) 2022: https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---ipec/documents/publication/wcms_854733.pdf; Hidden In Plain Sight report : https://parlinfo.aph.gov.au/parlInfo/download/committees/reportint/024102/toc_pdf/HiddeninPlainSight.pdf;fileType=application%2Fpdf

We note the *Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Act 2023 (Cth)* received royal assent in the prior reporting period and as a result Australia's first Commonwealth Anti-Slavery Commissioner, Chris Evans, was appointed. In the recent reporting period Commissioner Evans released his strategic plan. We look forward to continuing the fight against Modern Slavery amongst peers and authorities.

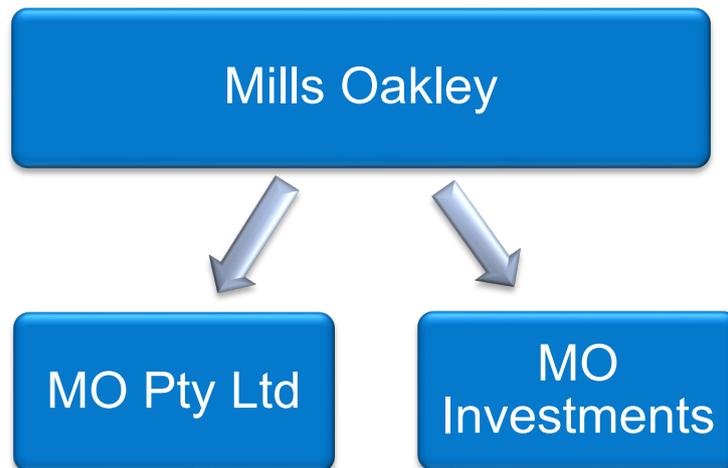
The MSA underwent a three-year review led by Professor John McMillan AO, with the report being published in 2023. The Government responded to that review and agreed or agreed in principle to 25 of the 30 recommendations that were contained in Professor McMillan's report. Following the cessation of the recent reporting period consultations were commenced on the Government's response and we are following closely to understand any legislative or policy reform that results from these processes.

Mandatory Criteria 1 and 2 (MSA s16(1)(a-b)): Identification, structure, operations and supply chains

Mills Oakley (ABN 51 493 069 734) is a partnership, with our registered office at Level 6, 530 Collins Street Melbourne, Victoria. Mills Oakley is a full service, national commercial law firm providing legal services to our clients. We have been trading for 159 years and have an innovation and client focus. We have offices in Melbourne, Sydney, Brisbane, Canberra, Perth, Adelaide and Darwin. We were resourced by 1,099 partners and staff in our recent reporting period.

Mills Oakley also fully owns Mills Oakley Investments Pty Ltd (**MO Investments**) and Mills Oakley Pty Ltd (**MO Pty Ltd**) (together the **MO Entities**). MO Investments operations consist entirely of holding our investments. MO Pty Ltd manages the business affairs of the company but does not hold any assets. Neither of these entities employ staff.

Neither MO Investments nor MO Pty Ltd are reporting entities under the MSA, but both are entities that Mills Oakley owns or controls.



Everyday Justice is 100% owned by Mills Oakley and is not a reporting entity under the MSA. Everyday Justice has four lawyers who are permanently seconded into the service from Mills Oakley and one part time legal assistant. Of those lawyers, three (one at Lawyer level and two at Associate level) are seconded four days a week and one lawyer (the Principal Solicitor) is seconded three days a week. These lawyers are employed by Mills Oakley. Everyday Justice also hosts university students as part of their clinical placement programs, offering hands on experience to law students interested in pursuing

careers in the social justice sector. Everyday Justice engages approximately eight volunteer law students at a time who work one day per week for a 12-week period during university semester. None of the Everyday Justice staff are on visas.

Approximately 82.5% of Mills Oakley's workforce are permanent employees or partners, 13% are casual workers, and 4.5% are on temporary contracts (for example fixed-term contracts, parental leave coverage, seasonal clerks etc). Of our entire workforce, only eleven staff members (or 1%) are from overseas, working in an arrangement where their visa ties them to the business. We noted the introduction of the Workplace Justice Visa in 2024 which provides increased rights for these staff members. We do not hold any original copies of our employees' identification documents. All workers recruited from overseas are paid in accordance with Australian laws regarding awards and wages. Neither MO Investments nor MO Pty Ltd employ staff.

Tier one of our supply chain (being those suppliers we directly contract with), in the recent reporting period was made up of about 642 suppliers. These suppliers provide goods and services to Mills Oakley, the MO Entities and Everyday Justice. Mills Oakley acknowledges that our supply chain extends beyond those with which we have direct contractual relationships.

Our tier one suppliers include: accounting, consultant, and legal/bar services; marketing services and advertisements; architectural services; archiving and document management; asset security and security services; art; books; building management services; cab, carpark, and transport services; catering and events services; food and drink; cleaning and maintenance services; conveyancing and property services; courier and postage services; IT software, hardware and services; dry cleaning; electricity and water; employee assistance programs; fire, first aid and safety; florist; flu vaccinations; insurance; office supplies and stationary; fit outs and furniture; construction related goods and services; pest control services; printing supplies and services; recruitment agencies; various subscriptions; training services; transcription services, events and venue hire.

Of our 642 tier one suppliers, 93.3% are based in Australia. This is a slight increase compared with prior reporting periods. The overseas suppliers are based in the USA, UK, New Zealand, Canada, Switzerland, Hong Kong, India, Brazil, the Netherlands, Jordan, Turkey, France, Israel, the Philippines, Brazil, Fiji, and Indonesia. For our major suppliers we have a scheduled service delivery meeting, ordinarily conducted annually.

Mills Oakley also procures goods or services on behalf of our clients (**Client Related Procurement**). We contract with these suppliers simply as an agent for our clients, so our relationship is less direct, but we believe it is important to consider what role we can play in these unique arrangements also. Our tier one supplier list only includes those suppliers that we directly procure from, and does not include Client Related Procurement. The vast majority of Client Related Procurement relates to medical services and legal services (such as barristers or services such as provision of client medical records, medico-legal examinations, expert evidence etc).

MO Investments holds only a small number of investments in Australian start-up companies. Everyday Justice has four suppliers unique to its own operations including two suppliers of software, one website support supplier and one insurer. All are based in Australia or New Zealand.

Mandatory Criteria 3 (MSA s16(1)(c)): Risks of Modern Slavery

Mills Oakley is aware that because of the prevalence of Modern Slavery, in particular in the Asia-Pacific region, every entity has risks of Modern Slavery in its operations and supply chains. We note that risk indicators in this space are constantly changing, and we are aware, for example of the impact of evolving armed conflicts around the world which contribute to new dynamics and hotspots.

Mills Oakley acknowledges that continually taking steps to understand where the risks of Modern Slavery are in our operations and supply chains, and how these risks change each reporting period, is a crucial step towards taking effective and accurate action in response to those risks. We have carefully considered the United Nation's Guiding Principles on Business and Human Rights to gain a deeper appreciation of how an entity like ours can cause, contribute to, or become directly linked to Modern Slavery.

Our operations primarily involve the provision of legal services, and we consider them to be lower risk. Lawyers are subject to stringent rules around ethics and conduct and our industry is closely regulated. Furthermore, many of our permanent employees who are under the Legal Services Award are required to record their time and this data is reconciled annually to ensure we are paying at or above the award based on actual hours worked. We would immediately backpay any individual who recorded more hours than the award rate allows for. We consider that this lowers the risk of Modern Slavery practices within our operations given we track working hours so closely. We understand that casual, contractor and seasonal employees are more vulnerable to exploitation. Fortunately, only a very small portion of our workforce is made up of these kinds of employees. We have only seven premises on which our employees work and all employees are contracted to work regular business hours. This allows greater visibility over our workforce and the safety of our employees. As our newer offices in Darwin and Adelaide are established and grow, we will take care to make sure the same standards are implemented there as within our other offices across the nation. We are aware that there have been various investigations into the legal profession regarding the working hours of employees and that, while not an example of modern slavery, the existence of significant overtime work can indicate a culture that is more fertile for worker exploitation. We have detailed below the action we have taken in response to these risks.

Given our structure as a national partnership, we operate in a decentralised procurement model which means that processes, relationships and timeframes involved in procurements can vary. We understand this dispersal of oversight may increase the risk of Modern Slavery. However, while oversight is decentralised, we do conduct scheduled service delivery meetings with our contracted suppliers and carefully monitor performance and any issues arising from these relationships. Most of our contracts are longer-term stable contracts and due to the lengths of the contracts and the nature of our operations we don't often place particularly short delivery timeframes on our suppliers.

As above, tier one of the MO Entities' supply chain is made up of about 642 suppliers. This figure has slightly increased since our last reporting period. We note also that the contents of our tier 1 supply chain are not overly diverse. Many of our tier 1 suppliers provide the exact same types of goods and services to Mills Oakley being solely those items necessary for the provision of professional services. Though we understand the risk with each supplier is unique, we believe having a smaller range of goods and services is helpful in increasing our visibility over potential risks to an extent.

We have identified the following suppliers as posing a higher risk of Modern Slavery, due to the particular category of goods or services that they supply: catering; cleaning and maintenance services; dry-cleaning services; information and technology software, hardware and services; office supplies and stationery; fit outs and furniture; security services and recruitment agencies. We are endeavouring to investigate these suppliers in future reporting periods.

Of our 642 tier one suppliers, they are located as follows:³

³ Utilising the Global Slavery Index 2023 prevalence rates (victims per thousand people) with low prevalence being countries with less than 2 victims; medium prevalence being countries between 2 and 3.5 victims; high prevalence being countries with over 3.5 victims.

- **93.3%** in Australia
- **2.7%** in low prevalence countries: New Zealand, Canada, the United Kingdom, Switzerland, the Netherlands, France
- **0.9%** in medium prevalence countries: Hong Kong and the United States of America
- **2.3%** in high prevalence countries: Jordan, Turkey, India, Brazil, the Philippines and Indonesia. We have also included Israel in this count despite the 2023 statistics placing it in the medium prevalence zone, due to the ongoing conflict in the region. We have included Fiji in this count as very little data is held as to the prevalence in that region and we understand that absence of evidence is not evidence of absence.
- **0.8%** in global or multinational suppliers

Based on the two criteria of geographic location and type of goods/services a risk rating has been assigned to each supplier. Two suppliers have been flagged as high risk under both criteria and a third is flagged as high risk because of its location alone. We have also identified medium risk suppliers as those flagged under just one of the criteria and a third risk category for suppliers for which more information is required. We do note that the vast majority of overseas suppliers are law firms that we contract with on behalf of our clients for the purpose of trademark registration often on behalf of clients. We take care to only contract with reputable recognised firms in this regard.

Mills Oakley acknowledges that our supply chain extends beyond those with which we have direct contractual relationships. From this exercise we further understand how our risk assessment changes as we peer deeper into our supply chains. We promise to continue to further understand the subsequent layers of our supply chains in future reporting periods.

Mills Oakley is not aware of any actual incidents of Modern Slavery cases that it has caused, contributed to or been directly linked to. We are aware that fully understanding our position in this regard is a complex and challenging exercise and we endeavour to continue to search for more risks and information to further assure ourselves of this position.

Mills Oakley acknowledges the impact that world events have on Modern Slavery risks. For example, the COVID-19 Pandemic as well as armed conflict in various regions. We know that flow on effects from these sorts of events can place great pressure on a number of people and businesses and that any such pressures may expose vulnerable workers to an increased risk of exploitation.

Mandatory Criteria 4 (MSA s16(1)(d)): Actions to assess and address risks

Mills Oakley is making a concerted effort to identify, prevent, mitigate and account for how it addresses Modern Slavery risks. Our desire is to take meaningful action in this space and, as such, we remain committed to our continuous improvement approach looking to build upon the action taken in our prior reporting periods and will ensure that the quantity of action taken does not become priority over the quality of action at any point in time. This approach is consistent with the United Nation's Guiding Principles on Business and Human Rights.

Special Visit from Moe Turaga – Lived Experience Expert

At Mills Oakley, we understand that we have so much to learn from people with lived experience of modern slavery. The inclusion of lived experience knowledge is critical in our actions to assess and address Modern Slavery and ensuring our approach is truly fit for purpose.

In March 2025, as part of Mills Oakley's Annual Modern Slavery Awareness Week (detailed below) we had the great privilege of being joined by Lived Experience Advisor Moe Turaga. Mr Turaga attended our

Brisbane office in person to speak to our staff, and his talk was broadcast across all offices nationwide. Mr Turaga is a true advocate for change and his powerful insights and courageous telling of his firsthand experiences served as a reminder of the urgent need to address the harsh realities of Modern Slavery.

It was an honour to hear Mr Turaga's story and learn how we can all take meaningful steps toward creating a world free from Modern Slavery. We also learnt about facilitating safe pathways for survivors to escape exploitation. As a result of the session with Mr Turaga, our Modern Slavery team made some adjustments to our internal policies and processes to reflect lessons learnt from Mr Turaga. His resilience and dedication to inspiring change are truly remarkable and we were so grateful for the opportunity to learn from him. Mr Turaga was formally engaged on commercial terms, with Mills Oakley acknowledging the importance of economic empowerment for people with lived experience of Modern Slavery.

Annual Awareness Week

In 2022, we commenced an Annual Modern Slavery Awareness week. In 2023, this was centred around 2 December which is the International Day for the Abolition of Slavery. This year it was held from 24 – 28 March 2025 and entailed:

- A special session with Lived Experience Advisor Moe Turaga (detailed above) for all staff;
- A speech by our internal Modern Slavery Experts for all staff;
- All staff walked into work at the start of Modern Slavery awareness week to find a [Tony Chocolonely](#) chocolate bar on their desk and received a note that said *Modern Slavery is a serious issue in industries we frequently encounter like coffee, fast fashion and chocolate. This chocolate is ethically made – because everyone deserves fair treatment.* Tony Chocolonely is an organisation with the goal to end exploitation in the cocoa industry. Tony Chocolonely aims to do this in three ways: raising awareness; creating commercially successful chocolate without the use of exploitation; inspiring others to act.
- Daily emails to all staff including an interesting fact or statistic on Modern Slavery, links to further resources and questions to prompt staff to consider their own interactions in this space. We also provided a link to our intranet page and of course support services available for people affected by modern slavery. Topics this year included: high risk products imported in Australia, the Government's response to the 3-year legislative review of the MSA, child labour in the cocoa industry, Australia's inaugural Commonwealth Anti-Slavery Commissioner and recent statistics around Modern Slavery reporting in Australia from the Australian Federal Police;
- Our Learning and Development Team included details of our awareness week in their monthly Newsletter that is circulated to all staff;
- External marketing on LinkedIn to spread awareness outside of our firm.

The engagement from staff was wonderful, with our internal Modern Slavery experts receiving a range of emails and comments with questions and stories being shared.

Our operations

Lawyers are subject to stringent rules around ethics and conduct, and furthermore our profession is closely regulated. We also comply with all Australian workplace laws including the *Fair Work Act 2009* (Cth), with the guidance of our workplace relations, employment and safety specialists and experts. All of our employees are provided with employment contracts detailing the conditions of their employment and their various rights and obligations.

We have a specialised Modern Slavery team at Mills Oakley who provide expert advice and assistance to many reporting entities in this space, conduct seminars and presentations around Australia and overseas, and work closely with not-for-profit organisations, civil society and many Australian businesses to improve the education, awareness and quality of response in this space. This team has grown in size

over the last reporting period and continues to carefully oversee our own operations, undertake the identification of risks in our business and constantly build upon our approach to effectively assess and address same.

Amongst other practice areas, Mills Oakley provides expert advice in the areas of workplace relations, employment and workplace safety and are acutely aware of the laws, regulations and best practices in this area. We apply the same expertise that our clients receive to our own operations and in dealings with our own employees. We consider the application of this knowledge to our own operations to further decrease the risks of Modern Slavery occurring within same.

Policies and procedures

We believe that staff play a key role in our due diligence. Mills Oakley has a specific Modern Slavery Policy (the Policy) which is applicable to all staff and outlines the Mills Oakley's commitment to detect, assess, address and report on the risks of Modern Slavery or human trafficking within Mills Oakley's operations and supply chains. This Policy was reviewed within the last reporting period. This Policy details to staff the various pieces of legislation and guiding material that Mills Oakley expects all staff to comply with, including:

- *Fair Work Act 2009* (Cth);
- *Modern Slavery Act 2018* (Cth);
- *Modern Slavery Act 2018* (NSW);
- *Australian Criminal Code Act 1995* (Cth), specifically, Division 270 or 271 of the Criminal Code, extending to conduct in and outside of Australia;
- Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework;
- Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children; and
- ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

The Policy educates our staff on the definition of Modern Slavery and highlights areas within our operations and supply chains that may be higher risk. The Policy details to staff what our risk assessment and due diligence processes are in this area.

Finally, from a remedial perspective we advise staff that any staff member who breaches the Policy by engaging in or conspiring to engage in any Modern Slavery conduct may face disciplinary action, that Mills Oakley may terminate relationships with individuals or organisations on a breach and that referral action to proper authorities will be taken in cases involving breaches of the criminal law.

Our Policy was rolled out in our second reporting period (2020/2021) to all staff via an email which provided a copy of the Policy and our first Modern Slavery Statement. The Policy is available to staff at all times on our specialised Modern Slavery intranet webpage. All staff were required to read and refresh their knowledge of the Policy in our recent reporting period.

Mills Oakley understands that Modern Slavery includes only the most severe forms of exploitation. However, we also know that the existence of substandard workplace conditions can be a precursor to Modern Slavery. We have in place the following policies that we believe ensure our operations are aligned with our legal and ethical workplace requirements: Anti Bribery & Corruption Policy, Code of Conduct, Conflict Management Policy, COVID-19 Response Plan, COVID-19 Safe Working Environment, Diversity Policy, Drug, Alcohol and Smoking Policy, Fatigue Policy, Flexible Working Policy, Grievance Resolution Policy, Leave Policy, Equitable Briefing Policy, Time in Lieu Policy, Gender Equality Strategy, Pro Bono Policy, Mobile Device and Remote Working Policy, Privacy Policy, Parental

Leave Policy, Recruitment Referral Policy, Risk Management Policy, Violence Leave Policy, Whistleblower Policy, Workplace Behaviour Policy and Workplace Health & Safety Policy.

[Our Modern Slavery Intranet Page](#)

Our internal Modern Slavery intranet webpage was launched in our third reporting period (2021/2022) and includes copies of our most recent Modern Slavery Statement, our Policy and our Supplier Code of Conduct for staff to access at any time. It has an easy-to-use FAQ section to assist and educate our staff in this area. We inform our staff of the MSA, our training, reporting avenues, and the various steps we are taking in this area. We provide staff with the contact details of our internal Modern Slavery experts for further queries. The page continues to be updated in various ways to keep staff updated. We continue to monitor and track how many views the webpage has had in order to aid in us reviewing staff awareness levels, our approach to risks and the effectiveness of same. In the last 90 days only, 423 staff accessed this intranet page (nearly 40% of our total staff).

[Our Modern Slavery Internet Page](#)

In the recent reporting period we created our external facing Modern Slavery webpage on our website, [here](#). This provides increased breadth to the awareness efforts conducted to date.

Our page firstly provides details of how to report concerns to Police as well as the contact details of our Modern Slavery experts so that anyone can reach out with queries any time. The webpage also links to the New South Wales Anti-Slavery Commissioner's list of additional referral pathways for support for people who have experienced modern slavery.

Our webpage then details that Mills Oakley is a reporting entity and provides details of what Modern Slavery is. There is a link to our most recent Modern Slavery statement and then a frequently asked question section which provides a range of additional details.

Our internal experts will be tracking any enquiries received through this webpage so that we can continually improve upon the contents.

[Training](#)

Our internal Modern Slavery experts run interactive workshops in the Modern Slavery space every two years, with attendance mandatory for all staff, the last being in early 2024. The 2024 workshops involved two sessions of hour-long workshops conducted in person and virtually for staff all around the country. Our experts shared real stories of survivors and details of legal cases they have been engaged to act on involving Modern Slavery. This training continued the educational experience of our staff in a more meaningful way than online e-learning can and also refreshed staff knowledge on what Modern Slavery is, the prevalence and nature of Modern Slavery (including the updated data), explained what our legal obligations are as well as what further actions need to be taken by each staff member to ensure those obligations are met. We also updated staff on various changes in the law and around the world that had occurred in the recent reporting period and how those aspects impact Modern Slavery. Staff had at least an hour each session with our experts and were encouraged to guess statistics and ask questions resulting in a collaborative and effective improvement upon our training in this space. We carefully tracked which staff members attended these workshops live (as opposed to watching recordings at a later date) and were pleased that 673 staff did so.

To continue to bolster staff awareness alongside the interactive workshops, we required all staff to complete annual online training on Modern Slavery including mandatory reading of our Modern Slavery policy, our Modern Slavery Statement, our initial correspondence with our suppliers and our Supplier Code of Conduct. We previously worked with an external training provider to create this specific online training module on Modern Slavery, and the content was prepared with our internal Modern Slavery experts. The online course helps staff understand what Modern Slavery is, the impacts of Modern Slavery in present day society, what it means to have transparency in our supply chain, the MSA, and our reporting obligations. In our recent reporting period, 1,159 staff completed training in the course itself (the numbers are likely higher than our staff count due to staff changes). This high completion rate was

achieved by concerted efforts by our Human Resources and Learning and Development teams to ensure all staff understood the importance of completing this training and also the increased awareness achieved through the interactive workshops.

Reporting

Mills Oakley acknowledges that the nature of Modern Slavery means that many victims and surrounding individuals are unable to draw attention to their circumstances for fear of negative consequences. Through the work that Everyday Justice does, we have assisted survivors of Modern Slavery in understanding and assisting in enforcing their legal rights.

Mills Oakley has a detailed Whistleblower Policy which clearly sets out the circumstances around protected disclosures and encourages the reporting of matters that may cause harm to individuals. This policy ensures the protection of the identity of a whistleblower and protects whistleblowers against detrimental conduct. This allows individuals the freedom to raise reports of Modern Slavery without fear of retribution in circumstances that meet the terms of the Policy. Having retribution-free reporting avenues is a key element of accurate due diligence in this area and will ensure we have greater visibility over our risks.

Supply chain mapping

Mills Oakley understands that supply chain mapping involves examining *risks to people* and is a key part of due diligence in this area. We set aside our own legal, reputational and commercial risks to enable us to focus primarily on risks to people as per the United Nation's Guiding Principles on Business and Human Rights.

Reporting Period 2022-2023

In our prior reporting period, we undertook investigations into some suppliers that we identified as higher risk in the year before. One of the suppliers turned out to be a library subscription service, and we closely examined their documents including their supplier code of conduct and code of business ethics. This supplier made various responsible sourcing commitments and as such following investigations we lowered the risk rating of this supplier. Another two of the suppliers in our higher risk list we no longer procured from due to the contracts lapsing and services no longer being required.

We also examined our major coffee supplier, noting that coffee has a long history of links to modern slavery practices. We were pleased to find that our coffee supplier is already taking meaningful steps in this space, being a member of Sedex as well as the Specialty Coffee Association, a trade association with the purpose of making coffee a more sustainable, equitable and thriving activity from the farmers to the baristas. Our supplier through its bean supplier prepares an annual impact report engaging personally with the farmers they source beans from including farmers Maria from Colombia, Syeh from Indonesia, Gabriel from Uganda, Luiz Alberto from Brazil and Amesh from India.

Reporting Period 2023-2024

In our prior reporting period, we continued our process of investigating a list of five higher risk suppliers from the 2022/2023 reporting period. Of those suppliers, three we no longer procured from due to the contracts lapsing and services no longer being required. The remaining suppliers included a library subscription and an IT supplier for a cloud subscription service. Our IT suppliers all underwent rigorous processes in the 2023/2024 reporting period as Mills Oakley achieved ISO27001:2022 Certification. We no longer contract with the library subscription service due to reasons unrelated to Modern Slavery.

Separately, we commenced enquiries into a Federal Court case against one of the large banking institutions we work with. We discovered that AUSTRAC had been working with that bank since the Federal Court case to help them improve processes and frameworks and they note the bank has been cooperative.

In regard to new procurement, we investigated a potential relationship with a supplier in the Philippines. Our relationship managers worked together with our Modern Slavery experts over several months to

conduct due diligence on this potential supplier. We sent our Supplier Code of Conduct out, clearly specifying our expectations in this space. Our detailed Modern Slavery Questionnaire was also sent to the supplier and the responses received highlighted some risk areas. These risk areas were discussed in detail with the supplier over several calls and discussions. We built into the resulting contract several Modern Slavery requirements including that the supplier improve and implement policies and processes and providing clear deadlines for this action. We shared several of our very own policies and processes with this supplier, to assist them in this task. We are pleased at this outcome and feel it is an excellent example of taking our suppliers on the journey with us, leading to better results for everyone.

Reporting Period 2024 – 2025

In this reporting period, we investigated a list of six higher risk suppliers identified in the 2023/2024 reporting period. Three of the suppliers were engaged for a one-off event and we no longer procure from. A fourth supplier we no longer procure from due to contract lapsing and services no longer being required. The final two high risk suppliers included a well-known multinational software company and a subscription service based in Hong Kong. The former is an information and technology supplier and therefore undergoes rigorous due diligence as part of Mills Oakley's ISO27001:2022 Certification. We made further enquiries into the latter which turned out to be a peak body networking group that our firm had limited involvement with. There were only eight employees and all were based in Hong Kong and Australia. The operations of the entity were not extensive, and we expected given the operations the supply chain would be smaller. The entity itself has a Green and Sustainable Lending working group. It was considered that the entity could be regarded as lower risk for the time being.

We also continued our discussions with our Philippines based supplier, requiring them to gradually continue building up their approach to Modern Slavery risks. We also took a deeper dive into our cleaning supplier in the Brisbane office and were very pleased to find they are a reporting entity under the MSA and have fairly robust processes in place already in this area. We will continue to review the materials received from this supplier and provide any feedback as required. We are aware that cleaning can be a high-risk industry and so intend to focus on this area going forward. Finally, we became aware of news articles involving a supplier of ours allegedly underpaying staff. After several consultations with that supplier and communicating expectations, as well as reassuring ourselves that staff had been able to commence complaint processes in response, a decision was made for a range of reasons to find an alternative provider.

In a collaborative effort across many areas of Mills Oakley, we continue to update the list of the MO Entities' tier one suppliers and have reviewed the list to create a breakdown of each supplier based on the geographic location of a supplier, as well as the category of goods or services relevant to a supplier. We are conscious that our tier one suppliers are just one part of the picture of our supply chain, and as detailed above have sought to improve the process of data extraction over these suppliers as a step towards being able to review and analyse data from further tiers in future reporting periods.

There is no automatic correlation or causal link between an entity's spend and the actual risk of Modern Slavery occurring in a particular supplier's operations and supply chains. As such, we have not included spend as a factor in our analysis, opting instead to undertake mapping with known risk indicators in this area.

Utilising resources such as the Hidden in Plain Sight Report, the Attorney-General Department's resources, the NSW Anti-Slavery Commissioner's resources and the 2023 Global Slavery Index amongst others, we have identified higher risk suppliers based on geographic location and category of goods or services. The suppliers identified as potentially posing a higher risk of Modern Slavery are detailed under Mandatory Criteria 3 above. We will investigate these suppliers in our next reporting period, in order to better understand the risks presented by same. Our Modern Slavery experts will workshop an approach to further investigate these risks.

Our focus in any Modern Slavery risk assessment is on the human rights impacts that might have the gravest impact, affect the greatest number of people, or a delayed response may affect remediability. At the moment, given we are only aware of risks rather than any actual incidents, we are unable to prioritise

actual incidents. We have every intention of factoring in severity and irremediability into our due diligence once we have the requisite information to allow this to be done.

Mills Oakley also acknowledges that risks in this area are fluid and we have seen how they change over time as we obtain greater visibility over our supply chain, as our suppliers and supply chain changes, and as the world and the occurrence of Modern Slavery alters and shifts. We have every intention of keeping our approach adaptable and responsive to these changes.

Suppliers

In reporting period one (2019/2020) Mills Oakley created a specific Supplier Code of Conduct (the Code) centred around Modern Slavery issues. In reporting period two (2020/2021), we sent the Code to every one of our tier one suppliers. As detailed above, our supply chains are not subject to great change from year to year. We recirculate this Code as needed to potential new suppliers.

The Code applies to all of our direct suppliers and assists greatly both in due diligence around our suppliers and in our remedial powers in the event that actual instances of Modern Slavery are ever discovered. The Code also provides that we expect our suppliers to have their own suppliers adopt the commitments in the Code.

The Code clearly articulates the standards of practice we expect of our suppliers and details our commitment to combatting Modern Slavery. Mills Oakley wants to partner with suppliers who are willing to join us in strengthening our response to Modern Slavery, who are committed to high standards of transparency and ethical conduct, and who support other suppliers in promoting corporate social and environmental responsibility.

The Code requires compliance with the following:

- *Fair Work Act 2009 (Cth)*;
- *Modern Slavery Act 2018 (Cth)*;
- *Modern Slavery Act 2018 (NSW)*;
- *Australian Criminal Code Act 1995 (Cth)*, specifically, Division 270 or 271 of the Criminal Code, extending to conduct in and outside of Australia;
- Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework;
- Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children; and
- ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

We require our suppliers not to do or omit to do anything that will cause us to breach any of the above laws and instruments. The Code educates suppliers on the definition of Modern Slavery, as well as detailing several relevant human rights and human rights related instruments and requires that suppliers uphold and comply with same. The Code details our expectations of suppliers when conducting their own risk assessments and due diligence processes. Under the Code, Mills Oakley has the right to audit our suppliers in a number of in-depth ways, and the Code requires our suppliers' full cooperation with any such processes or requests. We also require our suppliers not to take any adverse action against staff or third parties because of their disclosure of information under the Code. Suppliers are informed that referral action to proper authorities will be taken in cases involving breaches of the criminal law.

Our contracts with suppliers contain clauses on compliance with local laws. We have drafted precedent contract clauses that speak more specifically to Modern Slavery to add contractual weight to our supplier code of conduct. As discussed above, we utilised these clauses last reporting period in a new engagement. Given the decentralised nature of our procurement processes, we are still in the process of

updating these precedent contracts from an efficiency perspective as a result of different information gathered to date. We will continue to negotiate with various suppliers for the inclusion of same in our agreements in reporting periods ahead. We currently monitor the performance of our suppliers carefully and ordinarily engage in annual review sessions with suppliers to examine any issues with the relationship and dealings.

In reporting period two (2020/2021), our Modern Slavery experts reviewed a copy of our current contracts with recruitment agencies that we work with. In reporting period three (2021/2022), our Modern Slavery experts updated our Recruitment Consultant Engagement Terms to ensure sufficient transparency and protection for our prospective employees from any Modern Slavery related conduct.

We have also drafted a detailed supplier questionnaire aimed specifically at assisting Mills Oakley in identifying and assessing the risks of Modern Slavery within our supply chain. The questionnaire is currently over 40 questions long and is reserved for particularly high risks identified as it is quite robust.

Mandatory Criteria 5 (MSA s16(1)(e)): Assessing the effectiveness of our actions

Mills Oakley knows that risks in this area are fluid and can change over time as we obtain greater visibility over our supply chain, as our suppliers and supply chain changes, and as the world and the occurrence of Modern Slavery alters and shifts. Furthermore, we need to be sure that the steps we are taking in this area are actually creating positive change.

Our annual review of our Modern Slavery policy was conducted in the recent reporting period. Our webpage is a central point of information for all staff and contains contact numbers for those within the business who have the relevant expertise to answer questions on Modern Slavery. We are keeping track of any staff queries received to understand whether there are any areas for improvement in our staff education. As above, we also track viewing statistics regarding our website.

We are especially pleased to announce that we achieved a very high rate of completion for our more fulsome online modern slavery course. Further staff also reviewed our Modern Slavery Policy, Supplier Code of Conduct. This high completion rate achieved by concerted efforts by our Human Resources and Learning and Development teams to ensure all staff understood the importance of completing this training, and also the increased awareness achieved through the interactive workshops we held.

Our live interactive workshops enabled our experts to engage directly with staff on Modern Slavery issues and gain a deeper understanding of the levels of staff awareness in this space.

We have reviewed our supplier list each reporting period to update and amend the information contained within same so that our risk assessments remain accurate. This enables us to learn a lot about the way our risks and supply chain changes annually as well as what we can do to increase our oversight. We are reviewing the responses to the Code that we have received from our suppliers so that we may utilise that information in future risk assessments.

Mandatory Criteria 6 (MSA s16(1)(f)): Consultation

As above, this Statement is provided on behalf of Mills Oakley, which owns the MO Entities. The MO Entities share the same Board, executive teams, and employees. The MO Entities adopt the same policies and processes and, as above, share the same supply chain. The Everyday Justice Board consists of three individuals - one Mills Oakley partner, Mills Oakley's Chief Human Resources Officer and an external member who also serves on the Mills Oakley Board. Consultation therefore happens naturally.

This Statement was created through collaboration with the following key areas of our business: Human Resources, Information and Technology, Finance and Modern Slavery specialists. Consultation occurred with various senior personnel in those departments.

From our governing body

Mills Oakley makes this Statement in accordance with section 13 of the *Modern Slavery Act 2018* (Cth). Mills Oakley considers that its governing Board is its principal governing body for the purpose of the *Modern Slavery Act 2018* (Cth). This Modern Slavery Statement was considered and approved by the governing Board of Mills Oakley on 11 December 2025.



John Nerurker
Responsible Member of Mills Oakley's Principal Governing Body