

The cover image for the Modern Slavery Statement, featuring a dark, abstract background with shades of blue and green, overlaid with a semi-transparent white triangle pointing towards the top right.

Modern Slavery Statement

For the period 1 July 2024 to 30 June 2025

Allens acknowledges the Traditional Owners of Country throughout Australia, on whose lands we live and work. We pay our respects to Aboriginal and Torres Strait Islander peoples, their stories and their continuing cultures, and to Elders, past and present.

This modern slavery statement¹ is made and published jointly on behalf of the reporting entities, Allens (ABN 47 702 595 758), an Australian partnership providing legal services, and Allens Operations Pty Limited (ABN 87 004 992 607) as trustee for the Allens Operations Trust (**Allens Operations**) providing support services to the Australian partnership.

References to 'we', 'our' and the 'firm' cover the reporting entities, any entities they own or control and any associated entities.

This statement is made in compliance with the *Modern Slavery Act 2018* (Cth) (the **Act**) with respect to the financial year ending 30 June 2025.

1.1 Our commitment

We are committed to taking action to assess and address modern slavery risks in our operations and supply chain. We seek to apply a consistent approach to the management of modern slavery risks across all of the firm’s offices and business operations. In this modern slavery statement we describe the steps we have taken during the reporting period, and actions we plan to take to continually improve our approach.

Allens was a foundation signatory to the United Nations Global Compact in 2001, and our continuing goal is to promote and uphold the Compact’s 10 principles including those relating to human rights and labour standards. We also seek to promote Sustainable Development Goal 8.7 in relation to the eradication of forced labour, modern slavery and human trafficking.

1.2 Our structure and operations

Allens is a leading international law firm providing legal services to clients in the public, private and not-for-profit sectors across a wide range of legal practice areas including:

- Corporate
- Projects & Development
- Disputes & Investigations
- Banking & Finance
- Tax
- Competition, Consumer & Regulatory
- Intellectual Property and Patent & Trade Mark Attorneys

The firm has offices in Australia (Brisbane, Melbourne, Perth and Sydney), Vietnam (Ho Chi Minh City and Hanoi), Singapore and Papua New Guinea (Port Moresby). In Australia, Allens operates as a partnership. Allens is a local partnership in Papua New Guinea and our offices in Singapore and Vietnam are locally licensed. Allens Operations is a separate service entity that provides support services to Allens’ legal practice.

Allens has an international alliance with global law firm Linklaters LLP. The complementary practices of Allens and Linklaters LLP provide clients with access to a global network, while operating independently.

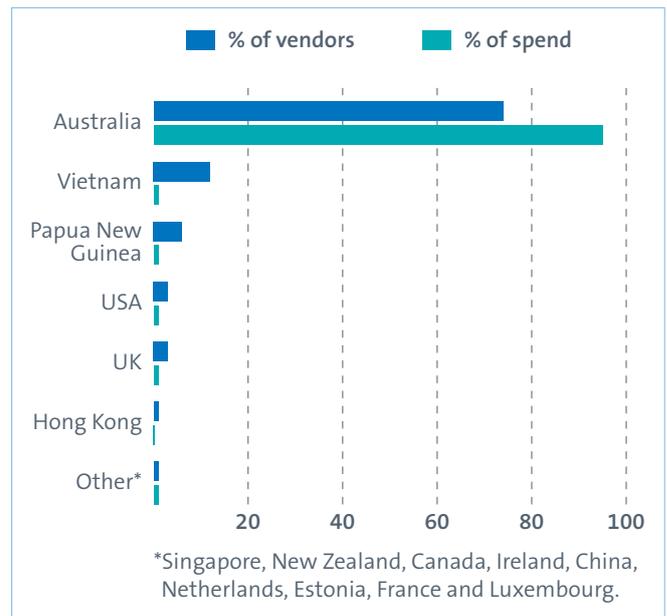
As at 30 June 2025, we had a total headcount of approximately 1880 people including partners, lawyers, practice support and corporate services staff. The majority of our people, approximately 96%, are based in our Australian offices and 4% are based in our Asia Pacific offices.

We contract some lawyers as part of Allens Adapt, our flexible resourcing program. We also engage some people on a contract basis to carry out the managed document review service we provide for clients. To support short-term business needs, including in connection with catering services and events, we engage other professional staff on a contract basis, or temporary agency staff.

1.3 Our supply chain

We source products and services from a range of suppliers to support the provision of our legal services and the business operations of our firm.

During the reporting period, the firm procured products and services from more than 930 direct suppliers². The graph below shows the distribution of these suppliers, by percentage of spend and total count. The majority of these suppliers are based in Australia, comprising 74% in total, and representing 95% of spend.



For FY25, the firm’s main procurement categories (based on spend) were:

- business operations (including leasing and facilities management);
- information and communications technology and services;
- professional services (including insurance);
- human resources;
- knowledge services
- business travel;
- marketing and events; and
- construction (office refurbishment and fit-out).

These procurement categories are drawn from reviewing our accounts payable records and construction project spend. Construction (fit out) has been added due to office refurbishment and fit-out projects in our Melbourne and Sydney offices.

We have continued to expand our review of direct suppliers to include firm-issued credit card transactions.³ The top 200 suppliers in respect of firm-issued credit card spend are primarily in the business travel, hospitality and entertainment sectors. The majority are based in Australia, comprising 84% in total, and representing approximately 89% of spend.

We acknowledge that our supply chain extends beyond our direct suppliers and we continue to consider the role of indirect suppliers in higher risk categories.

1.4 Identifying modern slavery risks

As previously disclosed, we apply a risk-based methodology to assess and prioritise modern slavery risks in our operations and supply chain. Our approach is informed by reputable tools including the Global Slavery Index (*GSI*)⁴ and the Global Estimates of Modern Slavery: Forced Labour and Child Labour (*GEMS*)⁵. We also monitor emerging risks on an ongoing basis through sources such as media monitoring, industry experts and NGO reports.

In assessing modern slavery risks, we consider the risk factors associated with geographic locations, industries, types of products and services, and business models. Our methodology for assessing geographic risk takes into account the location of direct suppliers and (where known) the location of product manufacture or service delivery.

To inform our evaluation of modern slavery risks, we also consider the concept of continuum of involvement as set out in the United Nations Guiding Principles on Business and Human Rights and the ways through which we have potential to cause, contribute to or be directly linked to modern slavery.

(a) Operations

We have considered the potential for modern slavery, such as the use of forced labour, to exist in our operations and we have again assessed the overall risk as low. As a supplier of legal services, we operate in a highly regulated sector and have a workforce composition that is considered to be at lower inherent risk of modern slavery practices. Although our total headcount increased slightly during the reporting period, more than 96% of our people are located in Australia, which has been assessed by the GSI as having a lower prevalence of modern slavery practices. We take action to comply with all applicable employment legislation, and have written terms of employment for all employees. We also take action to comply with minimum wage requirements and conduct checks to confirm all employees are being paid above minimum wage, including those covered by the Legal Services Award 2020.

(b) Supply chain

We review our risk-based analysis of procurement spend on an annual basis, taking into account potential modern slavery risk factors. For this reporting period, due to property-related projects continuing in Melbourne and commencing in Sydney, we have continued to identify construction services and products as a category of procurement having higher inherent risk of potential modern slavery practices. The other categories listed were previously disclosed in our FY24 Modern Slavery Statement.

Category	
Information and communications technology (ICT) equipment	There are risks of potential modern slavery practices in connection with the extraction of raw materials, and the manufacture of ICT equipment in higher-risk geographies.
Promotional items and uniforms	There are risks of potential modern slavery practices in connection with the sourcing of raw materials, and the production and manufacture of these products. Risk factors include low cost business models, workers at risk of exploitation and complex supply chains that extend into countries with higher risks of modern slavery practices.
Facilities management (eg, cleaning, security, waste management and recycling services)	Modern slavery risks may be elevated if vulnerable workers are present, and subcontracting practices are in use. Transparency may be more limited when these services are indirectly provided through third parties including building managers.
Hospitality, food and catering services	There have been reports of worker exploitation in the food, agriculture and hospitality sectors in Australia ⁶ , and forced and child labour in connection with imported food products such as fish and cocoa ⁷ .
Outsourced business support and labour hire	Potential risks may be heightened in this procurement category in circumstances where there is reduced visibility and control over recruitment practices, and workers' employment terms and conditions.
Construction services and products for office fit outs and refurbishments	There are risks of potential modern slavery practices in the raw construction materials supply chain, where risk factors such as a low-skilled workforce, complex supply chains and high-risk geographies are present ⁸ . The workforce for construction projects in Australia includes many foreign workers on temporary visas who are at risk of exploitation ⁹ .

Although the majority of our direct suppliers are located in Australia, we recognise that potential risks of modern slavery practices may be elevated for direct and indirect suppliers located in countries (including Vietnam and Papua New Guinea) that have been ranked by the GSI as having a higher prevalence of modern slavery. We also acknowledge that our direct suppliers may be part of complex supply chains and that potential risks may be heightened in lower tiers of our supply chains where we may have less visibility and leverage.

1.5 Assessing and addressing modern slavery risks

(a) Policy framework

As previously disclosed, the firm has a policy framework to support our provision of a fair, safe and inclusive workplace, to guard against practices that may be present in situations of modern slavery, and to guide our approach to assessing and addressing modern slavery risks in our operations and supply chain. We also have a responsible sourcing program designed to promote procurement practices that are ethical, and environmentally and socially responsible.

The following are the primary policies and procedures that support the firm's approach to assessing and addressing modern slavery risks in our operations and supply chain.

Policy/process	Purpose
Responsible sourcing policy and process	Sets out our processes for taking environmental and social considerations (including modern slavery risks) into account in our procurement decisions.
Supplier Code of Conduct	Applies to our suppliers and sets out the minimum standards we expect in relation to ethical business practices, human rights and labour practices, and environmental management.
Ethics code	Sets out our standards for professional conduct and ethical behaviour, including our opposition to all forms of slavery and our commitment to take action to identify, assess and address risks of modern slavery in our operations and supply chain.
Resolving issues policy	Sets out ways to raise a concern, and our commitment to resolving issues in a supportive and constructive way.
Whistleblowing policy	Sets out how to raise concerns about suspected serious misconduct without fear of reprisals or victimisation.

As detailed in our previous statements, we also have a number of additional policies that indirectly support our approach, including our Anti-corruption policy, Inclusion and diversity policy, Respect and fairness (anti-discrimination, bullying & harassment) policy, Family and domestic violence policy, Workplace health and safety policy and Third party engagement policy.

These policies cover obligations, commitments and expectations relating to workplace behaviours and practices, and procedures for entering into third party arrangements. All of the above policies and procedures apply to partners, employees and contractors in all of our offices, other than the Supplier Code of Conduct which applies to our suppliers.

During the reporting period we embedded our Supplier Code of Conduct in our form for onboarding new suppliers, and the Code is also publicly available on our website.

(b) Due diligence

Our approach to supplier due diligence is risk-based. For direct suppliers identified as having potentially higher inherent risks of modern slavery, our due diligence processes may include desktop screening checks of publicly available information, database searches, ongoing media monitoring and seeking written confirmation that suppliers understand and are able to meet the standards in our Supplier Code of Conduct.

Our due diligence expands beyond tier one suppliers. During the reporting period, we continued to conduct and refresh due diligence enquiries in connection with indirect suppliers in procurement categories at higher inherent risk of modern slavery practices, including providers of waste management services.

We also continued working with technology provider Informed365 to support our supplier due diligence process for higher risk procurement categories. In FY25, enhancements to the platform included updating and streamlining questions, as well as developing what the platform refers to as Continuous Improvement Pathways designed to strengthen supplier engagement and help suppliers make improvements in priority areas.

We also took the following actions in connection with procurement categories we have identified to be at higher potential risk of modern slavery practices:

- (i) updated the Request for Information template for the procurement of ICT hardware and software to incorporate specifications relating to responsible sourcing and modern slavery risk mitigation;
- (ii) for the planning and design phase of our new Sydney office premises, incorporated steps to assess and mitigate potential risks of modern slavery, including responsible sourcing criteria and specifications, consistent with the approach taken for our Melbourne office refurbishment project (as detailed in our FY24 Modern Slavery Statement) which entered the construction phase during the reporting period;
- (iii) refreshed due diligence processes for our courier and logistics service providers through online research and targeted self-assessment questionnaires; and
- (iv) renewed our commitment as a Fairtrade Supporting Workplace and continued to source Fairtrade-certified tea, coffee, sugar and cocoa for use in our staff kitchens.

(c) Training and awareness raising

We have continued to provide education sessions, a responsible sourcing and modern slavery e-learning module, and a dedicated responsible sourcing intranet site for employees to build knowledge and awareness of modern slavery risks, and capacity to apply the firm's responsible sourcing processes.

Our responsible sourcing and modern slavery e-learning module is a compulsory part of the standard induction program for people joining the firm. The module includes an explanation of modern slavery, details of the prevalence, risk factors and indicators of modern slavery, and the types of products and services at higher inherent risk of modern slavery practices.

During FY25, approximately 310 employees participated in training or an awareness raising event relating to modern slavery.

Training and awareness raising initiatives during the reporting period included:

- (i) hosting a staff webinar with two guest speakers: Papua New Guinea's first female Fairtrade cooperative chair, and the CEO of Fairtrade Australia and New Zealand who spoke about Fairtrade, and ethical sourcing trends, challenges and opportunities;
- (ii) developing and commencing the pilot phase for a training module focussed on applying responsible sourcing principles during the planning stage of procurement; and
- (iii) updating our responsible sourcing resources with the addition of a responsible sourcing planning template.

(d) Collaboration and external engagement

We recognise the importance of external engagement and participating in multi-stakeholder initiatives to share knowledge and refine best practice.

During the reporting period, we continued to be an active member of the United Nations Global Compact Network Australia (**UNGCA**) Modern Slavery Community of Practice for business members. As a member of the Australian Legal Sector Alliance (**AusLSA**), we also participated in AusLSA's Modern Slavery webinar series designed to facilitate sector-based awareness raising and engagement.

Through the firm's Business & Human Rights legal practice, we:

- (i) made a submission in connection with the development of the Australian Anti-Slavery Commissioner's Strategic Plan 2025-2028 (**Plan**), based on experience advising businesses on modern slavery reporting obligations under the Act and anti-slavery programs more broadly;
- (ii) participated in a stakeholder consultation session with the Commissioner's office to contribute to the Plan; and
- (iii) participated as a member of the Clean Energy Council's Modern Slavery Working Group.

Our legal practice also continued to provide advice and training to a range of businesses, government clients and not-for-profit organisations in relation to modern slavery programs, including approaches to human rights due diligence in the context of modern slavery risks, potential modern slavery concerns in value chains, and reporting obligations under the Act.

(e) Remediation and mechanisms for raising concerns

We continued to provide a number of internal and external mechanisms for employees and contractors to raise concerns about unacceptable behaviour, including in relation to potential modern slavery risks. Mechanisms include an anonymous complaints portal and support options such as access to confidential counselling.

In the reporting period, Allens piloted People Pulse, a survey designed to obtain regular insights from staff about what is working well in our firm, and where we can improve.

We also continued to:

- (i) promote our anonymous complaints portal to new employees through induction and through articles on the firm's intranet and reminded people of options available to raise concerns;
- (ii) embed a trauma-informed approach when managing concerns, including through implementing agreed processes and training for staff who manage concerns;
- (iii) aspire to maintaining a psychologically safe culture where people feel comfortable to speak up and raise concerns. This included developing tools, resources and providing coaching to people leaders within the firm.

As previously disclosed, our Supplier Code of Conduct requires suppliers to provide their workers with a mechanism to confidentially report grievances without fear of penalty, reprisal or harassment. The Code also includes a requirement for whistleblower protection and for reporting mechanisms to be accessible and well-publicised.

1.6 Evaluating effectiveness of our actions

To evaluate the effectiveness of our actions to assess and address modern slavery risks, we continue to monitor quantitative measures including supplier due diligence assessment and modern slavery training completion rates.

Through the firm's third party contract review process, we record the inclusion of modern slavery-related clauses and the firm's Supplier Code of Conduct in new and renewed supplier terms of agreement. During the reporting period, we continued to improve our tracking of modern slavery-related clauses in supplier terms of agreement and we aim to continue to increase the number of our suppliers who are required to comply with modern slavery laws and our Supplier Code of Conduct in their agreements for higher risk procurement categories.

We also regularly monitor the frequency and trends of all concerns raised (including any modern slavery concerns if they were to be raised) through our anonymous complaints portal and other avenues for concerns and feedback (eg, managers, partners or the People & Development team). We also report on these concerns regularly to the firm's Board, Risk Committee and Executive Committee.

The firm's Modern Slavery and Responsible Sourcing working group, comprising senior representatives from the firm's Business Operations, Office of General Counsel, Finance, Information Technology, Marketing & Client Services and People & Development teams has continued to meet with the objective of supporting operational implementation, monitoring progress and reviewing effectiveness of the firm's actions to assess and address modern slavery risks in our operations and supply chain.

During the reporting period, no instances of modern slavery were identified or reported through the firm's due diligence processes or grievance mechanisms.

1.7 Future action and progress

We aim to continually strengthen and improve our approach to assessing and addressing modern slavery risks in our operations and supply chain. In the table below we outline progress, including in relation to areas of focus identified in our FY24 Modern Slavery Statement, and identify new areas of focus for future action.

Risk assessment and due diligence

Progress

- Implemented modern slavery risk assessment and mitigation steps in the design phase of our new Sydney office fit-out.
- Incorporated our Supplier Code of Conduct into our supplier onboarding form.

Areas of future focus

- Conduct a review of our procurement-related policies and processes and develop an integrated supplier governance and procurement framework that incorporates modern slavery risk considerations.
- Review and update (as appropriate) the modern slavery clauses in our standard supplier contract template.
- Continue to monitor potential inherent risks of modern slavery in connection with the design and construction phases of our new Sydney office.
- Continue to review our risk assessment approach to address any new and emerging modern slavery risks and priorities, and monitor changes to our procurement spend and supplier base.

Training and awareness raising

Progress

- Developed and commenced the pilot phase for a responsible sourcing module focussed on the planning stage of procurement.

Areas of future focus

- Continue to develop and roll out tiered responsible sourcing training to support people with different levels of procurement responsibilities.
- Launch a new online training module focussed on our culture of respect, which will also encourage people to raise any concerns they have through the avenues available.
- Continue training for people leaders on managing and responding to concerns with a trauma-informed approach.

Collaboration and external engagement

Progress

- Contributed to the Anti-Slavery Commissioner's Strategic Plan 2025–2028 by making a submission and participating in business consultations through our Business & Human Rights legal practice.

Area of future focus

- Continue to participate in multi-stakeholder initiatives, such as the UNGCNA Modern Slavery Community of Practice, and support sector-led opportunities for collaboration and knowledge-sharing.

Remediation and measures for raising concerns

Progress

- Piloted new People Pulse surveys designed to obtain regular insights from staff on what is working well in our firm, and where we can improve.

Area of future focus

- Refine our People Pulse surveys based on learnings from the pilot, and implement a firmwide rollout.

Measures of effectiveness

Area of future focus

- Continue to develop and enhance measures of effectiveness, including in relation to training feedback and learning outcomes.

1.8 Additional information

Through our pro bono legal practice, we provide free legal support to individuals at risk of exploitation and to organisations working to protect them, including the International Centre for Missing & Exploited Children Australia.

Two focus areas of our pro bono practice are support for asylum seekers, and for people experiencing or at risk of homelessness. We work closely with three specialist migration legal services to assist clients to apply for asylum in Australia. Our partners and legal staff also regularly represent asylum seekers appealing or seeking review of unsuccessful protection visa applications. Through three homelessness legal services, we advise and represent people facing eviction from their housing or otherwise in need of legal support to overcome poverty related legal hardship.

During the reporting period, we also assisted a large cancer charity on a pro bono basis, in respect of its Modern Slavery reporting.

Allens has a full service ESG legal practice and our legal specialists produce publications, deliver presentations and advise clients in relation to the management of human rights risks in their operations and supply chains (including in connection with modern slavery).

1.9 Governance and consultation process

The Boards of Allens and Allens Operations are responsible for the oversight and approval of the firm's modern slavery statement. Day-to-day operation of the firm's responsible sourcing program, including our modern slavery response, is managed by the firm's Community Engagement Team and is overseen by the firm's Community Engagement Board (chaired by the firm's Managing Partner). The firm's Modern Slavery and Responsible Sourcing working group supports operational implementation, monitors progress and reviews effectiveness of the firm's responsible sourcing processes.

The firm has shared business functions and policies (including in relation to the management of modern slavery risks). In preparing this statement, a wide range of stakeholders from across the firm were consulted, including from the Office of General Counsel, Finance, People & Development, Business Operations, Information Technology, Marketing & Client Services, Innovation & Digital Solutions and Patent and Trade Mark Attorneys teams, and relevant staff for the Vietnam and Papua New Guinea offices. In this way, representatives of relevant entities were consulted.

Members of the Board of each reporting entity were given an opportunity to consider and provide comments on the statement prior to approval and publication.

The Allens Board approved this statement on 26 November 2025 and the Board of Directors of Allens Operations Pty Limited approved this statement on 3 December 2025.

Signed By:



Chelsey Drake
Chair
Allens

Sydney

Level 4, 126 Phillip Street
Sydney NSW 2000, AUSTRALIA
T +61 2 9230 4000



Matt Graham
Director
Allens Operations Pty Limited

Index:

Mandatory criteria for modern slavery statements <i>Modern Slavery Act 2018 (Cth) s 16.</i>	Location of information
Identify the reporting entity.	Introduction
Describe the structure, operations and supply chains of the reporting entity.	1.2 Our structure and operations 1.3 Our supply chain
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	1.4 Identifying modern slavery risks
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	1.4 Identifying modern slavery risks 1.5 Assessing and addressing modern slavery risks
Describe how the reporting entity assesses the effectiveness of these actions.	1.6 Evaluating effectiveness of our actions
Describe the process of consultation with any entities that the reporting entity owns or controls.	1.9 Governance and consultation process
Provide any other relevant information.	1.1 Our commitment 1.7 Future action and progress 1.8 Additional information

Endnotes

- For completeness, and to comply with the reporting requirements in the Act, where our structure, operations, supply chain and processes have remained the same during the reporting period, some information has been re-stated from previous statements.
- This supplier analysis includes suppliers recorded in our accounts payable system, but does not include legal services suppliers (eg, barristers, law firm agents and expert witnesses) engaged on behalf of, or for the purpose of providing advice or services to or for the benefit of third parties ('legal services suppliers'), and firm-issued credit card spend.
- Our review of firm-issued credit card transactions excludes legal services suppliers.
- Walk Free Foundation (2023), The Global Slavery Index 2023, <https://www.walkfree.org/global-slavery-index/>
- ILO, IOM & Walk Free Foundation (2022), Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, <https://www.walkfree.org/reports/global-estimates-of-modern-slavery-2022/>
- Human Rights Law Centre et al (2022), Broken Promises: Two years of corporate reporting under Australia's Modern Slavery Act, <https://www.hrlc.org.au/reports-news-commentary/broken-promises>; RMIT Business and Human Rights Centre et al (July 2023), Where's the beef? An evaluation of meat company modern slavery statements over two years, <https://www.rmit.edu.au/news/bright/wheres-the-beef>.
- Walk Free Foundation (2023), The Global Slavery Index 2023, <https://www.walkfree.org/global-slavery-index/>
- KPMG (2020), Property, construction & modern slavery: Practical responses for managing risk to people; US Department of Labor (2022), List of Goods Produced by Child Labor or Forced Labor, https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2021/2022-TVPR-List-of-Goods-v3.pdf
- Ibid.