

Slater and Gordon Lawyers

Modern Slavery Statement
FY 2024



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Background

Slater and Gordon has a zero-tolerance approach to modern slavery in any part of its business. We are committed to safe workplaces and to the implementation of systems and controls designed to minimise the risk of modern slavery within our business and supply chains.

This Modern Slavery Statement (**Statement**) is made in accordance with the mandatory reporting criteria set out under the *Modern Slavery Act 2018 (Act)*. This Statement covers the reporting period of 1 July 2023 to 30 June 2024.

This Statement provides details of the steps Slater and Gordon have taken to address and mitigate the risk of modern slavery both within our operations and in our supply chain. Slater and Gordon is committed to continuously improving strategies to identify and mitigate modern slavery and ethical sourcing risks.

This Statement addresses each of the mandatory criteria set out in section 16 of the Act:

Mandatory Criteria for Modern Slavery Statements	Index
Identifying the reporting entity	A
Describe the reporting entity's structure, operations and supply chains	B
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	C
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	D
Describe how the reporting entity assess the effectiveness of these actions	E
Describe the process of consultation with any entities the reporting entity owns or controls	F
Include any other information the reporting entity considers relevant	G
Statement Endorsement	H

A. Reporting Entity

This Statement is made on behalf of Slater and Gordon Ltd (ABN 93 097 297 400) (**Slater and Gordon Ltd**), the reporting entity pursuant to section 5 of the Act, and each of its wholly owned subsidiaries (together **Slater and Gordon Group**)

The Board of Directors of Slater and Gordon Ltd, as the head company of Slater and Gordon Group, has reviewed and approved this Statement for publication as a joint statement in accordance with section 14(2)(d)(ii) of the Act.

For the purposes of this Statement, Slater and Gordon, 'we' and 'our' collectively refers to Slater and Gordon Ltd.

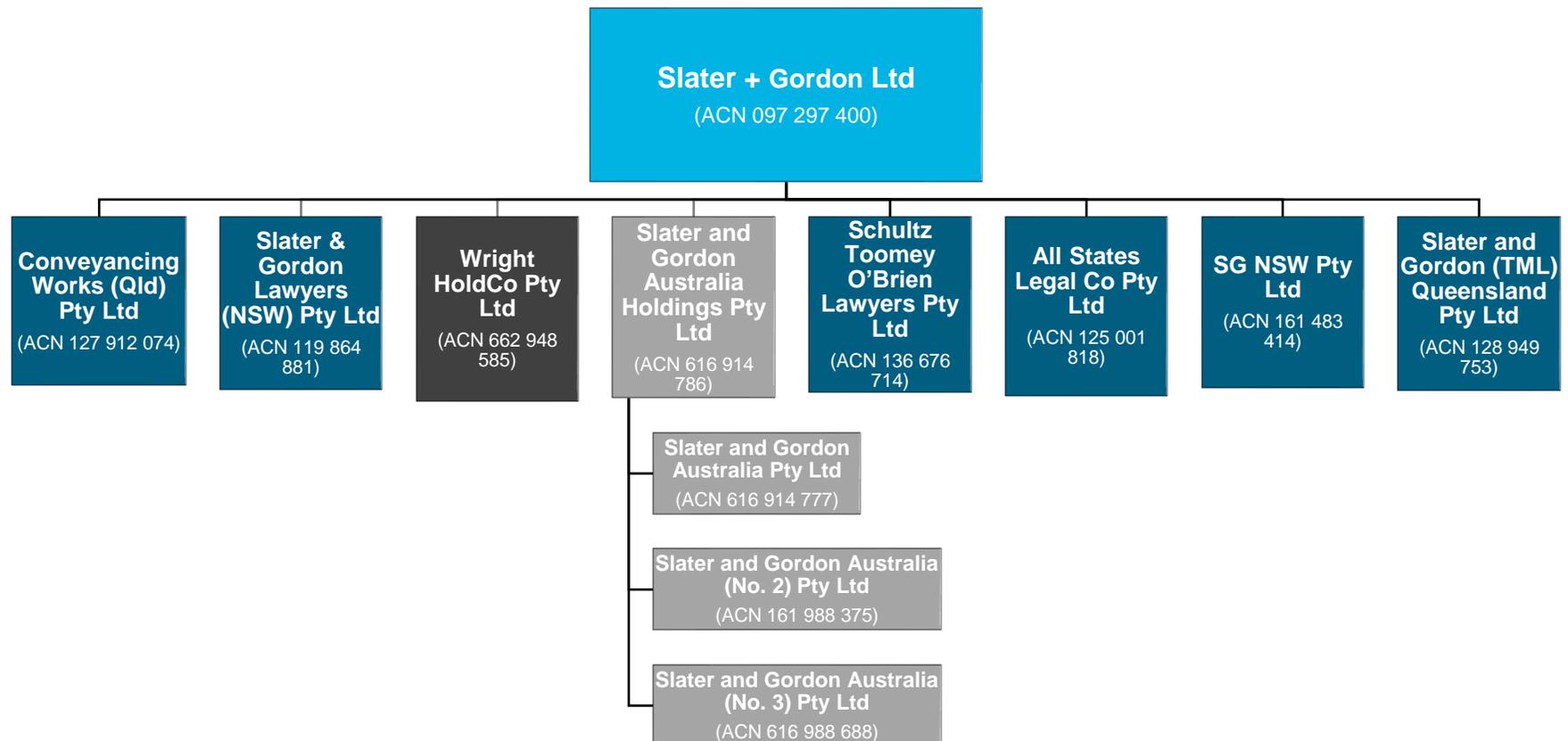
B. Structure, operations and supply chains

There were no significant changes to our operations or supply chains during the reporting period. Our legal structure, operations and supply chains are summarised below.

1. Structure

Slater and Gordon's legal operations are conducted primarily by Slater and Gordon Ltd, an unlisted public company.

The Slater and Gordon Group operates through the following entities, all of which are wholly owned subsidiaries and each of which is subject to the direct influence and control of Slater and Gordon Ltd:



All subsidiaries identified via the dark blue text box were acquired via historical M&A activity and currently operate in “run-off” mode only, to finalise the legal matters of legacy clients (no new business is being entered into by any of these entities). The subsidiaries identified via the light grey text box are entities that have never traded and are due to be wound up. The entity identified via the dark grey text box was acquired by Slater and Gordon as part of a debt forgiveness arrangement in early 2024 and is now a dormant entity, due to be wound up.

Slater and Gordon’s various subsidiaries each have their own boards, but do not employ any staff directly or undertake any significant procurement activity (other than engaging professional advisers to progress the resolution of clients’ claims, where relevant).

The overall business functionality is overseen by the Board of Directors and Executive Leadership Team of Slater and Gordon Ltd. The majority of supplier contracts are entered into by Slater and Gordon Ltd.

2. Operations

Slater and Gordon is a leading Australian consumer law firm, providing specialist legal services in a broad range of areas including:

- personal injury law
- superannuation and insurance law
- class actions
- abuse law
- employment law

Our legal services are provided by Australian registered lawyers from 42 locations around Australia, including Victoria, New South Wales, Queensland, Western Australia, Northern Territory and Tasmania. We are regulated by State based statutory bodies and professional associations.

3. Supply Chain

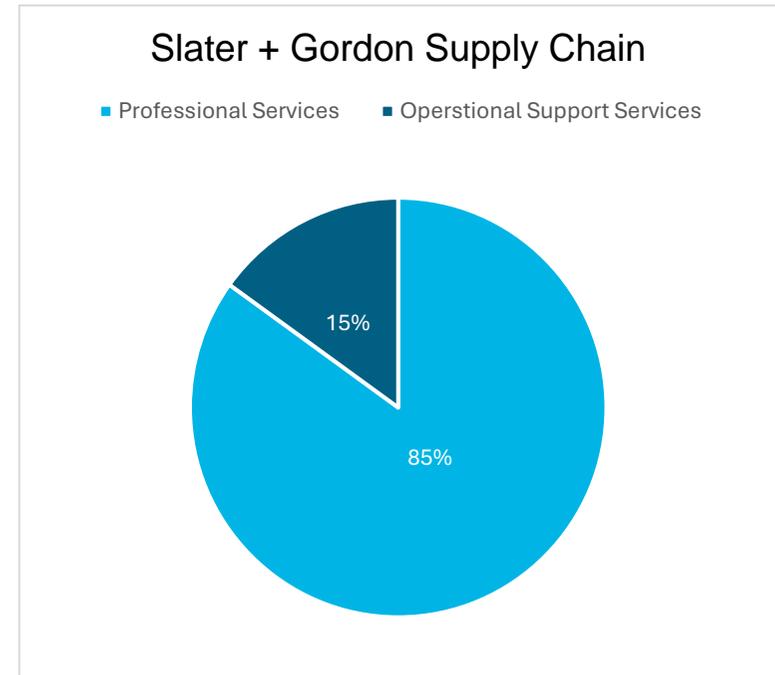
The category of our suppliers within our supply chain have been grouped into professional or operational services during FY24 to support our modern slavery risk assessment process as set out in section 4. The analysis of these categories is outlined below:

- **Professional Services**

Slater and Gordon's supply chain predominantly consists of goods and services acquired to assist in the delivery of legal services. By spend, our largest suppliers are our financiers, litigation funders and other professional service providers. These professional service providers consist of barristers, other law firms, legal, medical and other subject matter experts who are engaged on behalf of our clients to assist with the progression of our clients' legal matters.

- **Operational Support Services**

We engage operational service consultants and providers to provide us with essential business services, such as external auditors, IT services, marketing, recruitment and facilities maintenance. Together, these services enhance the resilience and efficiency of our supply chain, enabling Slater and Gordon to operate smoothly and sustainably.



C. Modern slavery risk identification in operations and supply chain

We apply a risk-based approach to assessing modern slavery risks in our operations and supply chain. Our assessment is informed by external datapoints such as the Walkfree¹ and inherent modern slavery risks associated with jurisdiction, sector / industry, products and services and workforce. We overlay our assessment of inherent risks with the information we obtain through engagement with our suppliers. The following summarises the outcome of our risk assessment during FY24.

1. Our Operations

At Slater and Gordon, we employ diverse and talented professionals to provide legal services to clients and manage our essential business functions. Our People & Culture Team manages our recruitment process and is responsible for compliance with employment laws and obligations. At times, we do rely on the use of short-term contractors, labour hire agencies, and foreign staff on visas. We recognise we may have less visibility and control over workers and their employment arrangements in these situations. In addition, the legal sector is generally assessed as being low risk for modern slavery.¹

2. Our Supply Chain

- **Our Professional Services Supply Chain**

Professional services, such as legal, medical, and finance are highly regulated industries within Australia. Individuals we engaged for the provision of professional services are almost exclusively based within Australia where there is negligible risk of modern slavery within these operations.

- **Our Operational Services Supply Chain**

We acknowledge that no industry or sector is immune to modern slavery and there is inherent modern slavery risk in the goods and services procured directly and indirectly by our suppliers. We have assessed the modern slavery risk of our suppliers by reference to

¹ Walk Free international human rights group provides that sectors and products at high risk of modern slavery are informal and unregulated, with poor visibility over lower tier suppliers, reliant on a workforce to carry out jobs that are considered undesirable, hazardous or low-skilled and are seasonal and low-paying. Examples of high-risk sectors include industrial cleaning, meat works, hospitality, construction, manufacturing, agriculture and fishing

their main country of operation, and the level of risk generally associated to the industry or sector, and have identified the following areas as having a higher risk of modern slavery practices:

- **International Supply Chain Risk**

Of the 3500+ vendors with whom we have direct contractual relationships only 23 are located internationally, representing one half of a percent by number and a little over one percent of our total supplier expenditure in FY24.

Whilst none of our international suppliers are located in countries with higher incidences of modern slavery,² it is possible that their supply chains may include products or services sourced from such regions. Currently, we lack direct visibility into our operational supply chains though we continue to undertake due diligence and incorporate best practice procurement as part of our ongoing response to modern slavery risks. This involves applying our risk management processes to identify suppliers who may be more vulnerable to modern slavery risks, thereby indirectly exposing us to such practices.

- **Industry Specific Supply Chain Risk**

The industry sectors relevant to our supply chain which present a higher inherent risk of modern slavery are IT hardware and services, commercial cleaning services³ and branded merchandise and stationery⁴. These three industry specific supply chains make up less than 3% of our operational suppliers.

- **IT Hardware and Services**

Slater and Gordon procures a wide range of technological hardware and services as a necessary means of conducting business. It is widely known that there is a higher risk of modern slavery in the technological hardware industry, as such products are typically manufactured in countries carrying a high risk of modern slavery, including forced labour, and use products that have been mined under conditions that amount to modern slavery.

- **Commercial Cleaning Services**

The cleaning services industry represents a moderate risk of modern slavery, being an industry characterised by a high prevalence of migrant labour, the low-skill nature of the work and the propensity for work to be sub-contracted. Presence of these risk factors necessitates a higher degree of due diligence when selecting cleaning suppliers directly – to this end

² North Korea, Eritrea, Mauritania, Saudi Arabia, Türkiye, Tajikistan, United Arab Emirates, Russia, Afghanistan, and Kuwait have the highest prevalence of modern slavery, with six G20 nations among the countries with the largest number of people in modern slavery, India (11 million), China (5.8 million), Russia (1.9 million), Indonesia (1.8 million), Türkiye (1.3 million) and the United States: <https://www.walkfree.org/global-slavery-index/findings/global-findings/> [13 November 2024]

³ [Cleaning Accountability Framework – Public consultation on the Nation Action Place to combat modern slavery 2020-24](#) [20 August 2024]

⁴ [Australian Red Cross Addressing Modern Slavery – A guide for Australian Businesses](#) [20 August 2024]

we have previously declined to engage suppliers who are unable to provide assurance that they will not sub-contract the work. We have less control over (and visibility of) cleaners' working conditions in circumstances where cleaning services are engaged via building management, rather than directly.

➤ **Promotional products and stationery**

The promotional products and office stationery supply industry was identified as having higher vulnerability to modern slavery in terms of the production of those items, which tend to be low cost, and high volume, with the consequence that they tend to be manufactured in countries known to have sub-standard working conditions, including excessive hours of work and very low wage rates.

D. Modern Slavery Risk Management Actions

In FY24 we continued to further develop our response to the risk of modern slavery in our supply chains through extending the maturity of our established governance and procurement processes. Our actions taken were as follows:

1. Governance

Our Board is responsible for corporate governance at Slater and Gordon and together with the Board delegated responsibilities to our Executive Leadership team, Audit and Risk Committee, and People and Culture Committee continued to provide oversight on all risks and risk management including modern slavery risks, workplace health, safety and wellbeing, environment, social and governance.

During FY24 our efforts to assess and address modern slavery risk in our operations and supply chain continue to be guided by the governance set out in the following policies and procedures:

- Ethical Sourcing and Modern Slavery Policy
- Whistleblower Policy
- Procurement Framework
- Anti-bribery and Corruption Policy
- Code of Conduct
- Disclosure and Workplace Relationships Policy
- Workplace Health, Safety and Wellbeing Policy
- Recruitment Policy
- Remuneration and Benefits Policy
- Diversity and Inclusion Policy
- Leave Policies

During FY24 we established and implemented our SpeakUp Hotline as part of our Whistleblower Policy. It is an anonymous reporting service which is available to our people, as well as suppliers and contractors and relatives or dependents of these individuals (or of their spouse), should they need to make a report and can be confident of the protections they are entitled to as set out in our Whistleblower Policy.

We believe that these policies, procedures and the supporting SpeakUp Hotline, combined with the various state based legal profession regulations, are an important foundation to assessing and addressing the risk of modern slavery in our operations and supply chains.

2. Procurement Framework

We rely on our centralised procurement function, led by a team of dedicated procurement personnel to implement modern slavery risk identification and assessments, as well as take steps to mitigate any modern slavery risks through our established procurement framework which includes:

- Procurement Policy
- Vendor Engagement Guidelines
- Disbursement Vendor Engagement Guidelines
- Whistleblower Policy

Our Procurement Policy and Vendor Engagement Guidelines require supplier selection be based on defined criteria, which includes modern slavery obligations. This criterion includes an evaluation of health and safety and ethical sourcing practices, as well as the completion of a modern slavery risk assessment and due diligence for all new and amended procurement activity with suppliers.

When considering suppliers in the high-risk areas identified above, we take the following factors into consideration:

- The supplier's publicly stated commitment to transparent and continuous improvement in the identification and mitigation of modern slavery risk in their supply chains (for example, as exhibited through their own ethical sourcing program or their own Modern Slavery Statement); and
- The supplier's responsiveness and cooperation in responding to our due diligence enquiries, including their readiness to provide details of their ethical sourcing policies and employment standards.

Additionally, all new and renewing supplier contracts are negotiated to include either a modern slavery obligations clause, or evidence the supplier is bound by the Act. Wherever possible, we use our preferred modern slavery clause, which includes rights of audit and the ability to terminate in the event of non-compliance.

3. Education and Training

We continued to ensure that all new Slater and Gordon employees participated in an employee induction program in which they were required to review and be familiar with all corporate policies, including the Ethical Sourcing and Modern Slavery Policy and the Whistleblower Policy. All new employees in FY24 were required to complete an online course on the topic of Modern Slavery.

Modern slavery awareness training also continued to be included within the rolling categories of topics chosen each year for inclusion in the mandatory governance and compliance training assigned to all Slater and Gordon employees bi-annually. If any employee fails to undertake mandatory training this is taken into consideration in their performance review.

E. Assessing the Effectiveness of our Modern Slavery Tools

We have continued to uplift the education and response to modern slavery throughout our business during FY24 and manage compliance with our established policies and procedures through our dedicated procurement and risk functions. We have assessed the effectiveness of our modern slavery tools as follows:

- Monitoring for suspicion of or reported incidents of modern slavery within our workforce and our supply chain
- Continually reviewing policies and procedures to ensure they comply with our legal obligations including the Act
- Ensuring all employees complete their annual mandatory modern slavery training
- Inspection of internal audit actions and usage of the Whistleblower Policy and other internal reporting mechanisms.

F. Consultation with Stakeholders

The Slater and Gordon Group consists of a number of wholly owned subsidiaries sitting under Slater and Gordon Ltd. Slater and Gordon Ltd is the only entity in the group actively writing new business, employing staff and leasing office space. All other entities are in “run off” mode, operating only for so long as necessary to finalise the legal matters of legacy clients.

The majority of Slater and Gordon’s procurement activity is contracted through Slater and Gordon Ltd, with the subsidiary entities only engaging directly with professional services providers where required to progress the legal matters of legacy clients.

The Executive Leadership team of Slater and Gordon provides oversight and direction for the operations of all companies in the Slater and Gordon Group. The boards of the various subsidiaries are comprised of senior executives who are also members of the Executive Leadership team.

The Ethical Sourcing and Modern Slavery Policy binds all entities in the Group.

G. Other Relevant Information

In the next reporting period, we aim to further develop our response to the risk of modern slavery in our business including by introducing a Supplier Code of Conduct, and extending the maturity of our established procurement and risk management processes described within section D.

H. Approval

The Board of Slater and Gordon Ltd authorised and approved the publication of this Statement on 12 December 2024 as a joint statement for the Slater and Gordon Group.



James MacKenzie AO
Chair of the Board
Slater and Gordon Ltd