

Quality and consistency through collaboration

Modern Slavery Statement 2019/2020

March 2021



Introduction



This Modern Slavery Statement (“Statement”) is made on behalf of Sparke Helmore Lawyers (ABN 78 848 387 938) and its controlled entities, including Spamil Pty Limited (as trustee for the Spamil Discretionary Trust) (ABN is 59 828 738 349) and Sparke Helmore Consulting (ABN 96 624 768 289) (together referred to as “Sparke Helmore”, “we”, “us” and “our”).

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

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

Reporting period 2019/2020

This is the first Modern Slavery Statement for Sparke Helmore under the *Modern Slavery Act 2018* (Cth). It covers the reporting period 1 July 2019 to 30 June 2020 and was approved by the Sparke Helmore Board on 25 March 2021.

Purpose

The purpose of this Statement is to outline Sparke Helmore's ongoing commitment to identifying and understanding the risks of modern slavery and human trafficking in our operations and supply chain. The Statement also reports on the steps we have taken to implement robust frameworks and processes to minimise these risks.

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

About Sparke Helmore

Sparke Helmore Lawyers is an Australian partnership and law firm delivering legal services. Sparke Helmore Consulting Pty delivers tax advisory and business consulting services that complement the core legal services that Sparke Helmore Lawyers provides to its clients. Sparke Helmore operates in Australia across nine offices and all states and territories other than Tasmania.



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

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

Sparke Helmore's values

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

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

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

Sparke Helmore's operations and supply chains

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

As a professional services business our supply chain primarily consists of goods and services, we procure to assist our people to deliver our services. The main goods and services we procure are:

- property services and management
- utilities (primarily electricity)
- information and communication technology (hardware, software, telecommunications, data storage and cloud services)
- insurance and financial services
- office fit outs, furniture, artwork
- general office consumables
- knowledge and subscription services
- postal and courier services
- document storage, destructions and archiving
- other professional services and consultancy services
- travel and accommodation services, primarily within Australia, and
- hospitality and catering services.

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



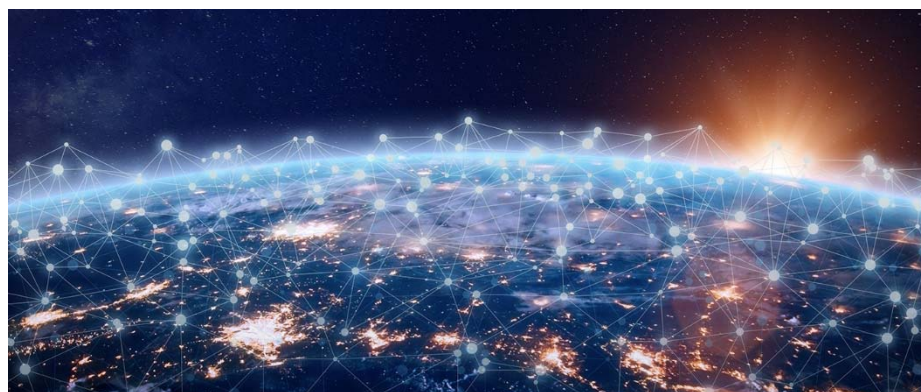
Impact of COVID-19 pandemic on supply chains

The COVID-19 pandemic had only a limited impact on our supply chains generally, and no identifiable effect on the modern slavery risks. During the COVID-19 lockdowns our people were able to seamlessly and safely continue to deliver our services from their home using the same technology solutions already implemented for flexible working arrangements, scaled-up to enable everyone to work flexibly at the same time.

Sparke Helmore ethical framework

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

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



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

We have assessed our supply chains and operations to be at low risk of involving modern slavery, with few areas having the potential for modern slavery activities, including through our direct suppliers. However, we acknowledge continual vigilance and continuous improvement of our own supply chain risk identification and assessment processes is required.

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

Actions taken to assess and address modern slavery risks

During our first reporting period we undertook a preliminary review to better understand and map our supply chain, focussing initially on our major suppliers. This review involved desktop analysis of our key suppliers, and through this process we assessed our supply chains to be of low risk of involvement in modern slavery. No specific risks were identified as requiring mitigation or remediation.

In our second reporting period we intend to improve our due diligence and supplier assessment processes to enable us to inquire deeper into our supply chains to confirm whether our initial assessment continues to be supported. If risks are identified, we will develop strategies to mitigate or remediate those risks, including where necessary to terminate arrangements with non-compliant suppliers.

Assessing the effectiveness of action taken

Following the initial work undertaken during our first reporting period, we intend to develop an annual program to review the effectiveness of our risk identification and assessment methodology, including a review of any actions proposed to address identified risks. This program will include classifying suppliers as and where appropriate as high, medium or low risk, and focussing attention on those assessed at the highest level of risk.

We also intend to undertake an annual review of our procurement processes in light of peer best practice, taking into account any further developments in modern slavery laws or guidance. Any such developments will be reflected in updated modern slavery awareness training for our procurement people. Our procurement people will be encouraged to provide feedback on our processes and modern slavery training to assist in assessing their effectiveness and areas for improvement.

This program of work will enhance our ability to take appropriate action in response to identified risks, and where modern slavery risks are identified, to escalate as appropriate to Head of Internal Legal and Chief Operating Officer. These two individuals will respond to the identified risk by developing a mitigation and/or management plan taking into account the specific context and circumstances and, where appropriate, reporting through to the National Managing Partner, Audit and Risk Committee, and the Board.

Consultation

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

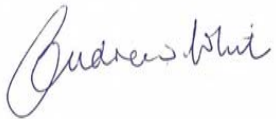
Future actions

Over the next year, we will be taking steps to improve our supply chain risk identification and assessment processes, including:

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

Board approval

The Boards of Sparke Helmore Lawyers, Sparke Helmore Consulting and Spamil Pty Limited approved this statement on 25 March 2021.



Signed by Andrew White

Chair Sparke Helmore Lawyers
Chair Sparke Helmore Consulting
Chair Spamil Pty Limited

