

Gadens Melbourne and Sydney Partnership

Modern Slavery Statement

1 July 2022 - 30 June 2023

This statement is made in accordance with Section 14 of the *Modern Slavery Act 2018* (Cth) (the **Act**) and constitutes our modern slavery statement for the financial year ended 30 June 2023 (**Reporting Period**). This statement covers the Australian business operations of S. Apikian & Others trading as Gadens Lawyers (ABN 29 991 935 627) and its associated entities (collectively **Gadens / firm / we / us / our**).

This is our inaugural statement. Gadens met the annual consolidated revenue threshold of more than \$100m for the first time during the financial year ended 30 June 2023 (**FY23**).

This statement details activities completed during the Reporting Period to identify, assess and address modern slavery risks across our business and supply chain, and outlines the focus for FY24, including key activities Gadens will undertake to continue mitigating the risk of modern slavery in our supply chain.

Structure and operations

Our structure and reporting entities

S. Apikian & Others (ABN 29 991 935 627) and Eltav Investments Pty Ltd (ABN 18 652 146 776), which provides business support services exclusively to S. Apikian & Others, operate collectively under the trading name Gadens. We operate exclusively from within Australia, and each entity has its own employees and suppliers. For convenience, any reference to Gadens refers collectively to both entities unless otherwise specified.

Our vision and purpose

Our vision is to be recognised as a leading Australian law firm that helps people achieve their purpose in a complex world. We lead by example, inspire others and adopt an innovative approach.

Our strategy guides our direction, and sets out what the firm will look like, what we need to do to achieve that, and what we believe is important on which to build a strong culture and future success. The strategic intent and framework embedded within our strategy provides the ethical framework against which we make decisions.

As providers of legal services, we have a responsibility to the administration of justice. We are committed to mitigating the risk of modern slavery within our supply chain.

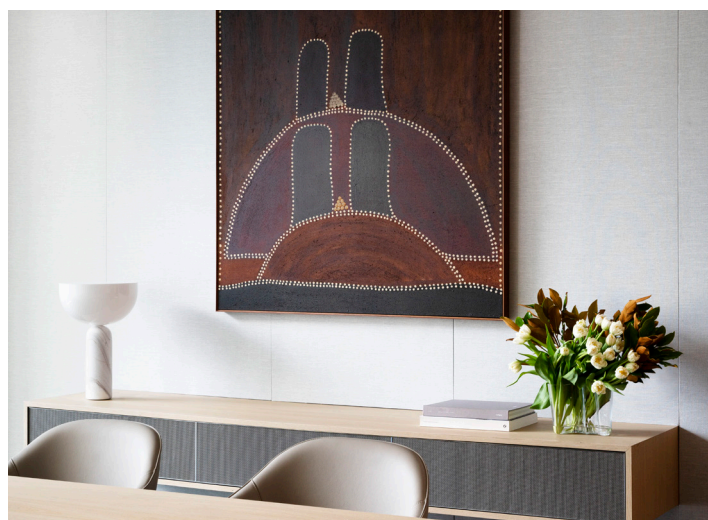
Our operations

Gadens is a leading Australian law firm, with our history dating back to 1847.

Our core business function is the provision of specialist legal services to our clients. Our services encompass banking and finance, corporate advisory, dispute resolution, employment advisory, government, intellectual property and technology, private clients, property and construction, planning and environment, recovery and insolvency, and tax.

We regularly undertake highly complex and day-to-day transactional legal work for a wide range of clients across multiple industry sectors. Our clients include Australian and multinational organisations as well as many small to medium-sized businesses and high-net-worth families and individuals.

We have over 400 staff operating from two office locations in the central business districts of Melbourne and Sydney. The majority of our staff are legal professionals supported by staff in internal service groups who provide finance, compliance and risk management, information technology, operations and facilities, corporate and people and development services for the firm.



Supply chain

Gadens supports and respects the protection of human rights, and as a firm are committed to achieving a high standard of ethical behaviour. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships and we have the same expectation of our suppliers.

We will not tolerate any abusive or unfair treatment of anyone within our business or as part of our supply chain and are committed to taking the steps necessary to ensure that slavery and human trafficking play no part in our business or supply chain.

Our approach to supplier selection and engagement

The suppliers with whom we do business must deliver products and services of an exceptional quality and must do so in a manner that does not compromise our ethical standards.

Given the nature of our business and the product and services we procure to support the provision of legal services, the risk that we have caused or contributed to modern slavery in our supply chain during the Reporting Period is rated as low.

We recognise that our purchasing activities have impacts in a number of areas, including ethical, economic, social and environmental. There remains a level of risk that we may be connected to modern slavery practices through the activities of our suppliers and their supply chain and through our decentralised approach to the selection and engagement of suppliers.

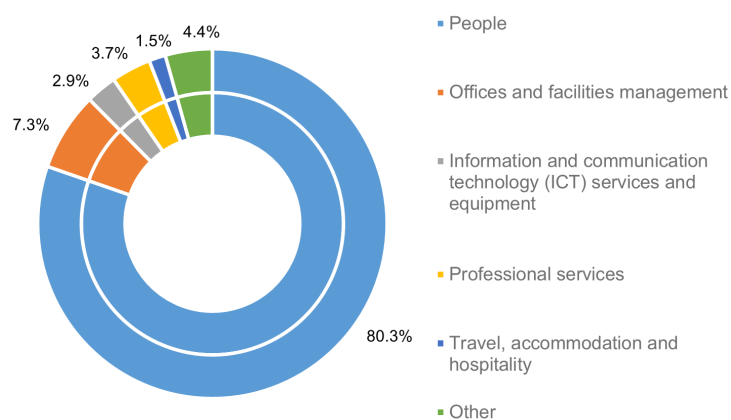
Addressing and mitigating this risk is the focus of our activities in FY24.

Material supply chain categories

The most significant procurement spend is the people we employ, followed by suppliers who provide products and services to support our people in the provision of legal services.

A detailed breakdown of these categories is provided in the chart and accompanying table below.

Supply chain categories | FY23 – Procurement spend by category



These categories represent 100% of our total procurement spend for FY23. This is consistent with prior years. There were no major changes to our supply chain during the Reporting Period.

Category	Description of supply
People	The people we employ to deliver a quality service offering to clients or support the delivery of these services. Remuneration paid to our people is the largest expense in our supply chain.
Offices and facilities management	The commercial office space we lease from top-tier landlords to accommodate our people and operate our business from. This includes fit out costs, maintenance, utilities, cleaning and security.
Information and communication technology (ICT) services and equipment	The systems, software and equipment that are necessary to maintain the technology infrastructure that supports our business. It includes both hardware and software.
Professional services	The services we acquire from others including external training services, external consultants and contractors, recruitment services and legal support services.
Travel, accommodation and hospitality	The service providers we use to organise, book and facilitate our travel and accommodation requirements. This category also includes meals whilst our people are travelling on business as well as client entertainment expenses.
Other	Additional products and services relevant to our business including financial services and insurance, marketing and merchandise, office stationery and legal disbursements that we procure from third parties on behalf of clients and the cost of which is 'passed through' to clients as a disbursement at cost (for example, barristers, expert witnesses, searches etc.).



Modern slavery risk management

Gadens is committed to identifying, assessing, managing and reducing modern slavery risk in our business operations and supply chain.

Procurement and supplier governance

Our values bind all our people and underpin everything we do, and we have embedded policies relating to anti-bribery and corruption and anti-money laundering / counter-terrorism financing into our procedures and workflows.

The procurement of high-quality goods and services is essential to enable us to deliver legal services to our clients. We procure goods and services from a vast number of suppliers, each with its own code of conduct unique to that entity and its operations. We have sought to ensure our firm interacts with reputable suppliers and contractors who share the same values as ours, and we are also seeking to align ourselves with suppliers that support our sustainability and social impact goals.

In assessing a new supplier, we consider the type of product or service provided, the location of the supplier and whether there are any known supplier-specific matters we need to take into account before engaging that supplier. We also undertake a check to confirm if the supplier has released a modern slavery statement and, if so, review the statement to verify their commitment to managing modern slavery risk in their business practices and supply chains.

Identification of modern slavery risk

As a responsible business, Gadens is taking proactive steps to effectively identify and manage our exposure to the risks of modern slavery and human trafficking.

During FY23 we completed an initial assessment of our business operations and our internal procurement and supplier processes to determine the potential level of modern slavery risk in our business operations and the actions we need to take further mitigate this risk.

We compiled a list of our current suppliers and completed an initial supplier risk assessment based on the procurement category, type of product or service provided and the location of the supplier's headquarters.

We identified and assessed 155 ongoing suppliers across our material supply chain categories:

- 69% of our suppliers are based in Australia.
- 27% of our suppliers are based in the United States of America or United Kingdom.
- 3.5% of our suppliers are based in countries other than Australia, the United States or the United Kingdom that are rated as low risk of modern slavery practices by the Walk Free Foundation's Global Slavery Index (GSI) for 2023. These countries include Canada, Germany, Finland and Ireland.
- One supplier, a software development and support company, is headquartered in a country rated as medium risk. This company is held solely by an ex-employee of the firm who returned to his home country, and as such he is aware of our values and what we expect from our people and service providers.

Our operations are limited to Australia, and 69% our supply chain is Australian based.

Australia, United Kingdom and United States of America are assessed by the Walk Free Foundation's Global Slavery Index (GSI) as having a low prevalence of modern slavery. This equates to 96% of our supply chain tier-one suppliers.

Our assessment of the risk of modern slavery existing within our operations is low. This view has been formed based on the analysis of our business operations and material supply chain. It also has regard to the regulated nature of the legal services profession in Australia.

We acknowledge the risk in our tier-two suppliers and the likelihood that some of our suppliers may source goods and services from international jurisdictions as part of their supply chain thereby increasing the risk of modern slavery – particularly in the ICT sector.

To mitigate this risk we prioritise the selection of reputable, locally based suppliers who have a verifiable commitment to managing modern slavery risk in their business practices and supply chains.

Actions taken to mitigate modern slavery risk

Gadens has taken the following actions in the Reporting Period to mitigate the risk of modern slavery occurring within our business operations and supply chain:

- Compiled a list of our current ongoing supplier network, including geographic location, supplier category and type of product or service provided by each supplier.
- Completed a desktop due diligence of our material suppliers to ensure that we only engage with competent, reputable, and where possible Australian-based, service providers and suppliers.
- Commenced screening and other checks for all new suppliers to assess their risk. The scope of the risk assessment and screening performed depends on the nature of the goods or services being procured, but typically includes financial checks, data security assessments, reference checks, obtaining / sighting of copies of relevant documents, site inspections / audits and / or modern slavery risk assessments.
- Commenced work on the development of a Supplier Risk and Governance (SRG) program to ensure all new and existing suppliers are regularly assessed for, amongst other things, modern slavery risk in their supply chain.
- Implemented stringent and robust recruitment, onboarding and people management policies and processes to ensure that we comply with all laws and regulations and provide a workplace that is flexible and prioritises work life balance. This includes sourcing new hires through internal recruitment processes and only using reputable recruitment agencies when required, verification of qualifications and experience and, for the small number of people within our workforce who are originally from outside of Australia, verifying their right to work in Australia under approved working visa conditions.
- Required all staff to participate in relevant training programs covering issues and policies related to modern slavery, including workplace behaviour training.

Policies and procedures

The following policies ensure a safe working environment for our staff and also support the management of modern slavery risk within our firm:

- Anti-Bribery and Corruption Policy;
- Anti-Discrimination and Appropriate Workplace Behaviour Policy;
- Compliance with Regulatory Obligations Policy;
- Equitable Briefing Policy;
- Family and Domestic Violence Leave Policy;
- Flexible Work Policy;
- Gifts, Benefits and Hospitality Policy;
- Occupational Health and Safety Policy;
- Unsatisfactory Performance and Misconduct Policy;
- Wellbeing Committee Policy; and
- Workplace Bullying Policy.

In addition to these formalised policies, our values reflect the essence of our firm. They underpin everything we do and guide our daily behaviour.

Monitoring and measurement

For this statement's Reporting Period no modern slavery incidents were identified amongst our suppliers.

This evaluation is based on the initial assessment of our current suppliers, the product and service categories we procure, the locations from which we procure and our current procurement practices.

The majority of our supplier relationships are longstanding and have spanned many years and we prioritise the engagement suppliers who are Australian-based.

Our focus on continuous improvement in managing and monitoring modern slavery risk within our supply chain will involve the completion of a number of activities in FY24 and these are set out below.

Continuous improvement activities in FY24

Gadens is committed to continually improving our practices to ensure that there is no modern slavery or human trafficking in our supply chain.

In the financial year ending 30 June 2024, Gadens is undertaking the following activities to continue mitigating the risk of modern slavery in our supply chain:

- Finalise our Procurement Policy and establish a formal framework for the purchase of all goods and services within the firm. The policy and framework will set out the minimum standards of behaviour we expect from those who wish to do business with our firm, including the responsible management of modern slavery risk within their supply chains as well as a focus on procuring carbon neutral products and services. Such a policy will also allow us to further consolidate our spend with key suppliers and assist us in managing the risk in these areas of our supply chain.
- Centralise procurement processes for our material suppliers within our Operations team. Appoint a lead person in each functional area who will be responsible for complying with the firm's procurement policy in their respective functional areas.
- Formalise and launch a Supplier Risk and Governance (**SRG**) program, under which every existing supplier and contractor is regularly assessed for modern slavery risk and every new supplier is assessed prior to engagement. Implement a risk and compliance monitoring solution to enable regular monitoring and assessment of tier one suppliers and their supply chain (tier two suppliers) for modern slavery risk.
- Finalise a whistleblowing policy that sets out the circumstances in which our staff and contractors can make a whistleblowing disclosure, the process that Gadens will follow in dealing with that disclosure and the protections that will apply to a whistleblower. Provide the safe channels and mechanisms for our staff and contractors to report any concerns anonymously and confidentially, including any suspected instances of modern slavery.
- Include modern slavery training in the firm's mandatory due diligence training program for all employees, with one module dedicated to modern slavery awareness and the firm's procurement policy and processes.
- Include specific anti-slavery and human trafficking contractual clauses in all new contracts for products and services that are categorised under our SRG program as high risk.
- Continue to rationalise our supplier base and reduce any risk exposure to modern slavery in our supply chain.
- Strengthen our Risk and Compliance function, which sits within the Office of the General Counsel. This function is currently responsible for receiving, evaluating and responding to modern slavery questionnaires that are received from our clients and undertakes activities to ensure modern slavery risk is monitored, assessed and addressed through internal policy and due diligence processes.

■ Consultation and approval

This statement was prepared by the Chief Operating Officer and General Counsel, with support from the Risk and Compliance function in the Office of the General Counsel (**OGC**).

This statement was approved by the Board of Gadens on 21 November 2023. A copy of the statement is published on our website, and on the Australian Modern Slavery Statement Register as maintained by the Australian Government's Attorney-General's Department.

For any questions relating to this statement, please contact the Office of General Counsel via email to notices@gadens.com.

Signed by Jeremy Smith, the Chair of the Board, being the designated and responsible person for each of the reporting entities.



Jeremy Smith

Chairman