



Modern Slavery Statement 2019/2020

This Modern Slavery Statement (Statement) is given jointly by MinterEllison (ABN 91 556 716 819) and Minter Ellison Services Pty Ltd (as trustee for the Minter Ellison Services Trust) (ABN 55 971 237 295) and covers certain Australian affiliated entities and other entities we own or control and businesses we operate, including MinterEllison Consulting and IT Newcom Pty Limited. Any references to "we", "us", "our" or the "firm" are references to the two reporting entities and the entities they own and control.

This Statement has been prepared in accordance with the requirements in the Modern Slavery Act 2018 (Cth) for the reporting period 1 July 2019 to 30 June 2020. It was approved by the MinterEllison Partnership Board on 28 January 2021 and by the Board of Minter Ellison Services Pty Ltd on 8 February 2021.

MinterEllison's purpose

We are an Australian based law firm and our purpose is to create lasting impacts with our clients, our people and our communities with the work we do each and every day.

We make this Statement as a further commitment to fulfilling our purpose. Reducing the risks of modern slavery in our supply chains is one of the many ways we seek to positively impact personnel who are directly and indirectly involved in our firm, as well as the broader community.

With a strong commitment to continuous improvement and to undertake the work necessary to minimise the risk of modern slavery in our operations and supply chains, we set out in this Statement our firm's current approach and forward commitments to understanding, identifying and addressing modern slavery risks in our operations and supply chains.

Our structure and operations

MinterEllison is a partnership. The firm is led by our Chief Executive Officer and Managing Partner of the Firm, Annette Kimmett AO and the Executive Leadership Team, with supervision from the MinterEllison partnership board, chaired by David O'Brien.

Minter Ellison Services Pty Ltd is the trustee of a services trust which provides administrative and support services to the firm. The MinterEllison Partnership operates a number of adjacent and complementary businesses including MinterEllison Consulting, Flex (a division of the firm) and IT Newcom.

The firm primarily operates within Australia with over 2,430 staff working in Sydney, Melbourne, Brisbane, Canberra, Perth, Adelaide, Darwin, and staff in representative offices Shanghai and Beijing.

We offer an integrated suite of legal and consulting services including:

- a full range of corporate and commercial legal services and advice to both private and Government clients across various industries;
- consulting services covering technology, tax, risk and regulatory, and infrastructure; and
- information technology consulting and advisory services.

Our team collaborates across Australia, New Zealand, Asia and the UK to deliver seamless services to our clients. We work with a network of associated entities, including MinterEllison LLP (Hong Kong), MinterEllison LLP (Ulaanbaatar), MinterEllison (London), MinterEllisonRuddWatts (New Zealand) and a legal practice operating in the Gold Coast, which are licenced to use the name MinterEllison. These associated entities are not owned or controlled by MinterEllison or Minter Ellison Services Pty Ltd.

Our supply chain

As a professional services practice, our principal activities involve the provision of legal and consulting services to our clients. We require certain goods and services to conduct our operations and deliver our services to our clients.

The majority of goods and services that we procure come from suppliers based in Australia. The main categories of goods are services that we procure (directly and indirectly) are:

- Information and communications technology (ICT): This includes computer hardware and software, cloud services, virtual data room services, virtual document exchange services, printers, audio/visual equipment and services;
- Business services: This includes supply of our office furniture and fit outs, stationery and branded items, knowledge subscription services, document archiving and management services and courier/postal services as well as printer maintenance services and document printing services.
- Professional services: Including taxation, external legal counsel, consulting and professional and personal development, and welfare training programs.
- Office facilities management: The services that we use to maintain our offices, including leasing, office maintenance services, utilities, cleaning and security.
- Mobility and travel: This includes vehicle and airplane travel bookings and accommodation bookings.
- Hospitality and catering: Including onsite and offsite catering and events.

Assessment of modern slavery risks

MinterEllison policies

Our assessment of the risk of modern slavery in our operations and supply chains has been carried out against the background of our existing policies and procedures aimed at ensuring a safe and just working environment for all of our staff. These include:

- Integrity Policy: In addition to our usual grievance procedures, this policy sets up channels for reporting genuine queries, concerns, grievances or complaints regarding illegal, unethical, unprofessional or unsafe conduct occurring at our practice.
- Anti-Bribery and Anti-Corruption: Consistent with our culture of trust, integrity and fairness, this policy outlines a zero tolerance for bribery and corruption.
- Anti-Discrimination and Harassment: This policy applies to all our operations and covers our policies and procedures relating to discrimination and harassment.
- Code of Conduct: This sets out how all members of our practice must conduct themselves to uphold our values and deliver on our purpose to create lasting impacts with our clients, our people and our communities.
- Empowerment, Inclusion and Diversity: This policy aims at leveraging our diversity through a culture of inclusion and collaboration to promote our values in the workplace.
- Work Health, Safety and Wellbeing: This policy outlines our commitment to building a safe workplace and summarises the important rights and obligations in relevant work health and safety legislation.

Approach to risk assessment

In order to assess the risks associated with our supply chains, we established a dedicated working group involving partners and representatives from our legal, information technology and procurement teams (Working Group).

During FY19/20, the Working Group analysed our firm's procurement spending to inform our risk assessment approach and to identify potential areas of modern slavery risk. We then developed and applied a risk assessment methodology taking into account a number of risk factors of modern slavery based on the supplier's location, industry/sector and product/services supplied using information published by the Walk Free Foundation (the Global Slavery Index 2018) and the International Labour Organization (Report: Global Estimates of Modern Slavery: Forced Labour and Forced Marriage).

In our first year of reporting, we carried out desktop due diligence on a substantial proportion of our first-tier suppliers, selected on the basis of the dollar amount spent and/or the purchased goods/services' criticality to our business and operations.

Based on this due diligence and applying our risk assessment methodology, we identified a number of key areas of modern slavery risk amongst our suppliers including:

Assessment of modern slavery risks

ICT suppliers

The ICT sector poses some level of risk of forced labour in certain regions and there is generally a lack of public information on ICT supply chain management, including with respect to the materials and components in ICT hardware. We devised and distributed a modern slavery risk assessment questionnaire for our material ICT suppliers based on dollar spend and criticality to the business to gain better insights into those suppliers' operations and supply chain. Once we received the responses from surveyed suppliers, we conducted an evaluation using a weighted risk rating matrix which emphasises areas of concern such as compliance with law and evidence of proactive steps taken by the supplier to address modern slavery risks.

The application of our methodology to our ICT suppliers did not produce any high risk ratings. Some suppliers did produce a medium risk result due to having a global support model that included post-sale services in countries with a higher prevalence of modern slavery according to the Global Slavery Index, such as India and the Philippines. A number of ICT suppliers also engaged subcontractors in the provision of goods/services provided to the firm and some of the subcontractors are located in countries with a higher prevalence of modern slavery.

After examining our operations and supply chain with consideration of these sector and geographic risks and our risk assessment of our ICT suppliers, we consider that our overall risk of causing, contributing or being directly linked to modern slavery through our operations and procurement of ICT goods and services remains low.

Other suppliers of services/third party arrangements

In addition to the ICT suppliers, the other category of potential risk we identified through the risk assessment process is in sectors where a large portion of people are paid the minimum wage or are new migrant workers. These sectors include hospitality and catering services, accommodation services, and office premises cleaning services. A number of these services are procured indirectly by the firm.

These types of services are also often procured through outsourcing and third party contracting arrangements which can increase the risks of modern slavery due to the lack of oversight by the firm and the direct supplier to the firm.

We performed a desktop analysis of these suppliers taking into account the suppliers' geographical location (both in terms of the country in which the services/goods are provided and the country in which the suppliers' headquarters are based), the sector/industry in which the suppliers operate, the type of product/services purchased from the suppliers, and the associated risks of prevalent modern slavery practices as reported by organisations including the Walk Free Foundation and the International Labour Organisation.

After examining our operations and supply chain with consideration of these sector and business model risks, we consider that our overall risk of causing, contributing or being directly linked to modern slavery through our operations and procurement of these types of goods and services is low, particularly as our suppliers are locally based and Australia is considered a low risk geography for modern slavery.

Actions to assess and address modern slavery risks

The key actions that the firm undertook during our first reporting period to assess and address the risk of modern slavery included:

- the establishment of the dedicated Working Group;
- the creation and implementation of the modern slavery project plan;
- the scoping of our operations and supply chain;
- the development of the modern slavery risk assessment methodology; and
- the due diligence undertaken through the desk top analysis of our suppliers and more detailed risk assessment that we have undertaken with our ICT suppliers, as outlined above.

These steps have allowed us to better understand our supply chain, identify potential risks and will inform our risk assessment approach for our procurement processes.

Given the outcomes of our risk assessment, no steps were required to remediate or mitigate the risks of modern slavery in our supply chain.

Assessing the effectiveness of our actions

Our monitoring and assessment process is developing and the focus of this first reporting period has been to develop the groundwork to be able to monitor the effectiveness of our actions to detect and mitigate risks of modern slavery in our operations and supply chain.

In order to assess the effectiveness of the actions we are taking and will be implementing in future reporting periods, our plan is to take the following actions:

- conduct an annual review of our modern slavery risk assessment methodology, including to:
 - evaluate findings from the further risk assessment on identified any medium or high risk suppliers to better inform our understanding of the areas of modern slavery risk in our supply chain; and

- review the risk assessment thresholds based on identified areas of risks, for example the monetary or materiality threshold(s) for requiring new suppliers to complete a standard modern slavery questionnaire, or the steps to evaluate risk assessment outcomes to inform the related procurement decision;
- conduct an annual review of our procurement and modern slavery related policies by taking into account the latest developments and laws relating to modern slavery and human trafficking and our findings from our risk assessments;
- monitor the number of personnel who have undertaken general modern slavery awareness training; and
- review feedback from those personnel in the procurement and contract management teams to ensure that they can effectively implement the risk mitigation tools.



Consultation

This Statement was prepared by the Working Group comprised of representatives of partners who are leading our firm's modern slavery risk management practice, procurement teams and General Counsel and Risk teams. The Working Group prepared and implemented a project plan which was endorsed by the firm's Executive Leadership Team to prepare this Statement. Members of the Working Group engaged with business units across the firm, including Finance and client practice groups, to understand the firm's supply chain. The Working Group worked collaboratively to develop and implement the modern slavery project plan and to prepare this Statement.

The Statement was reviewed by the Executive Leadership Team, prior to formal adoption by the MinterEllison Partnership Board and Minter Ellison Services Pty Ltd.

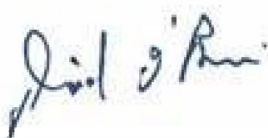
Other information – future actions

With our focus on continuous improvement and building on the knowledge gained from our due diligence and risk assessment, our plan is to take the following actions during our subsequent reporting periods to reduce the risk posed by modern slavery in our supply chains:

- develop risk assessment and mitigation tools, such as a standard modern slavery questionnaire and template supply contract terms to address modern slavery risks, and introduce these tools into the firm's procurement processes;
- update our procurement policy and develop standards which set out the minimum expectations for our suppliers and third party labour providers to operate ethically, including to address modern slavery risks in their business and also in their suppliers;
- capture any reported incidents of modern slavery within the firm or within our supply chain, undertake prompt investigation and reporting, and remediate or mitigate risk of repeated occurrence; and
- implement specific training in relation to the modern slavery risk management tools.

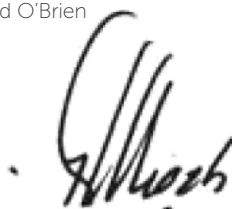
Dated: 19/02/21

Signed by:



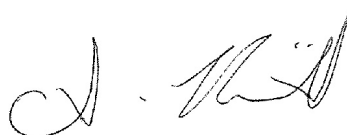
David O'Brien

Chairman of the Board of MinterEllison



Peter Coats

Chairman of the Board of MinterEllison Services Pty Ltd



Annette Kimmitt

Chief Executive Officer and Managing Partner of MinterEllison