



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 is the third modern slavery statement<sup>1</sup> made and published jointly on behalf of the reporting entities, Allens (ABN 47 702 595 758), an Australian partnership, and Allens Operations Pty Limited (ABN 87 004 992 607) as trustee for the Allens Operations Trust.

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 2022.

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<sup>1</sup> 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.

## 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.

The firm aims to uphold the highest standards of quality and integrity. We take action to support and respect the protection of internationally proclaimed human rights and we are committed to providing a fair and safe workplace, where our people are treated with dignity and respect.

Allens was a foundation signatory to the United Nations Global Compact in 2001, and continues 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) and Papua New Guinea (Port Moresby).

Allens operates as a partnership in Australia. Allens is a local partnership in Papua New Guinea and the offices in Vietnam are locally licensed. Allens Operations Pty Limited is a separate service entity and 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 a seamless international service, while operating independently.

As at 30 June 2022, we had a total headcount of approximately 1770 people including partners, lawyers, practice support and corporate services staff. The majority of our people are based in our Australian offices, with approximately 97% in Australia, 2% in Vietnam and 1% in Papua New Guinea.

We engage some contract lawyers and other professional staff as part of Allens Adapt, our flexible resourcing and contract review solutions for clients. From time to time we engage temporary agency staff to support short-term business needs, including in connection with catering services and events.

## 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 over 940 direct suppliers<sup>2</sup>. The map below shows the countries where these suppliers are based, with approximately 80% based in Australia.

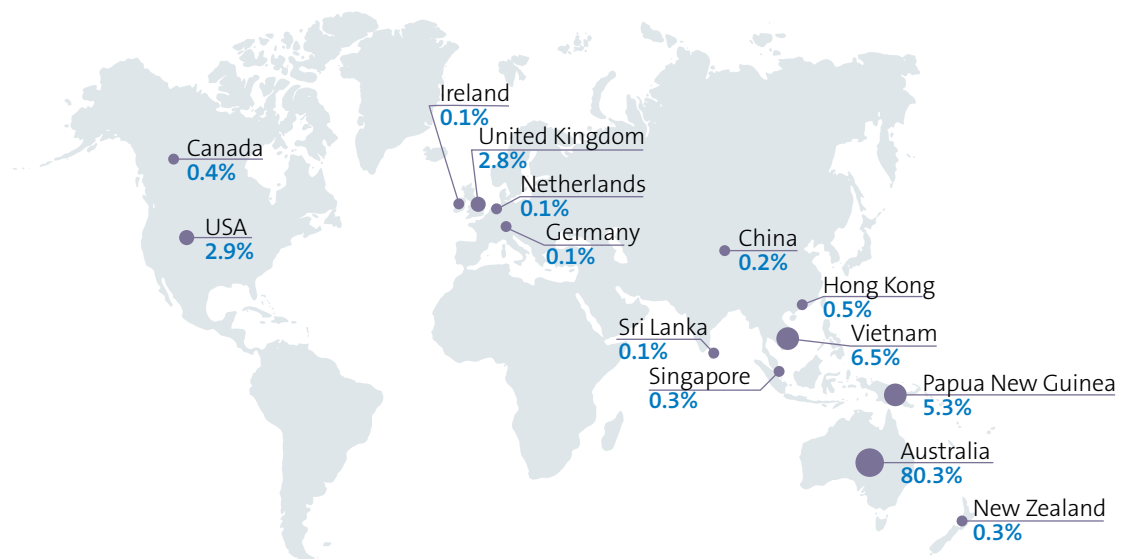


Figure 1: Allens’ FY2022 direct suppliers by country (base).

<sup>2</sup> This supplier analysis includes suppliers recorded in our invoice management 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, and credit card spend.

The firm's main procurement categories (by spend) in FY2022 were:

- business operations (including leasing and facilities management);
- information and communications technology and services;
- professional services (including insurance);
- human resources (including recruitment and training);
- marketing services; and
- knowledge services.

Our other procurement categories include business travel and hospitality services (including catering).

## 1.4 IDENTIFYING AND ASSESSING 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**)<sup>3</sup> and takes into account modern slavery risks associated with geographic locations, industries, types of products and services, and business models. We also monitor emerging risks on an ongoing basis through sources such as media monitoring, industry experts and NGO reports.

### (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 low risk of modern slavery practices. Although our total headcount increased during the reporting period, we continued to have over 95% of our people 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 conduct a risk-based analysis of our procurement spend on an annual basis, to confirm our procurement categories at higher potential risk of modern slavery practices. For FY2022, our analysis was conducted in consultation with the firm's Modern Slavery and Responsible Sourcing Working Group, and covered our potential to cause, contribute or be directly linked to modern slavery practices.

For this reporting period, we have added waste management, recycling and recruitment services to the following procurement

categories previously identified as being at higher risk of modern slavery practices.

- **Information and communications technology (ICT) equipment, promotional items and uniforms.** These products typically involve complex supply chains that extend into countries with higher risks of modern slavery practices. At these lower tiers of our supply chain, visibility and leverage are also more limited.
- **Facilities management (eg, cleaning, security, waste management and recycling services), hospitality and catering services.** These services carry a higher potential risk of modern slavery as the workforce may include short-term and migrant workers who are considered to be more vulnerable to risks of modern slavery practices.
- **Outsourced business support, labour hire and recruitment services.** Risks are heightened in this procurement category as we may have less visibility and control over recruitment practices, and workers' employment terms and conditions.

Although the majority of our suppliers are located in Australia, we also acknowledge that risks may be heightened for those 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 risks.

## 1.5 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.

During the reporting period the firm introduced a new Third party engagement policy and we reviewed and updated our Respect and fairness policy (formerly known as our Equal employment opportunity (**EEO**) policy) and our Resolving issues policy (formerly known as our Grievance policy). All the relevant policies and procedures (listed below) apply to partners, employees and contractors in all of our offices, other than the Supplier Code of Conduct which applies to our suppliers.

<sup>3</sup> Global Slavery Index 2018 <https://www.globalslaveryindex.org/resources/downloads/>

Policy/process	Purpose
Ethics Code	Sets out our ethical and compliance responsibilities and how these interact with our values.
Anti-corruption policy	Sets out our obligations and approach to the prevention of bribery and other forms of corruption.
Workplace health and safety policy	Sets out our obligation and commitment to maintaining a safe and healthy workplace.
Inclusion and diversity policy	Sets out our commitment to supporting and promoting a diverse and inclusive workforce, in which we value the contribution that people from different backgrounds and life experience bring to our firm.
Resolving issues policy	Sets out ways to raise a concern, and our commitment to resolving issues in a supportive and constructive way.
Respect and fairness policy	Sets out our expectations for the way we work together, and with clients and stakeholders.
Whistleblowing policy	Sets out how to raise concerns about suspected serious misconduct without fear of reprisals or victimisation.
Third party engagement policy	Sets out our processes and procedures in relation to arrangements with third party suppliers.
Responsible sourcing process	Sets out our processes for taking environmental and social considerations 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.

### (b) Due diligence

As previously disclosed, for suppliers assessed to be at higher risk of modern slavery our due diligence process includes desktop screening checks and database searches, and seeking written confirmation that suppliers understand and are able to meet the minimum standards in our Supplier Code of Conduct.

During the reporting period we reviewed and updated our desktop and database searches and we implemented a process of ongoing media monitoring. We also conducted a review of the firm's Supplier Code of Conduct, and updated the minimum standards we expect of our suppliers including in relation to social responsibility and human rights.

To support our ongoing supplier due diligence, including the distribution and management of self-assessment questionnaires, we evaluated and selected a third party supplier due diligence and risk assessment platform, and will commence working with them in FY2023.

### (c) Training and awareness raising

During the reporting period, we continued to provide education sessions and a dedicated responsible sourcing intranet site for employees, to build awareness of modern slavery risks, and capacity to apply the firm's responsible sourcing processes.

Training for staff with procurement responsibilities included a workshop for members of the firm's facilities management team, focusing on the practical application of the firm's modern slavery risk assessment and due diligence procedures.

For new employees joining the firm, we incorporated our Modern Slavery and Responsible Sourcing e-learning module into the firm's induction training program. The e-learning module includes information about modern slavery risk factors and indicators, the firm's responsible sourcing processes and steps to take if a suspected situation of modern slavery is identified.

Expert presenters from two of the Allens' pro bono clients, the Human Rights Law Centre and ACRATH, also presented a modern slavery and responsible sourcing webinar that was open to all staff to attend. The topics covered included the nature and prevalence of modern slavery, products at highest risks of modern slavery and guidance on responsible sourcing practices.

During FY2022, approximately 570 employees completed training or attended an awareness raising event relating to modern slavery.

### (d) Collaboration

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

Allens is a signatory to the United Nations Global Compact, and during the reporting period we joined and participated in the Modern Slavery Community of Practice convened by the UN Global Compact Network Australia for business members.

Through our membership of the Australian Legal Sector Alliance we also participated in a modern slavery practitioner roundtable to discuss benefits and models for collaboration in our sector.

### (e) Remediation and mechanisms for raising concerns

We 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.

During the reporting period we:

- (i) reviewed and updated the firm's policies, resources and mechanisms for raising concerns and resolving issues;
- (ii) commenced a project to refresh employee awareness of, and improve the channels and options for, resolution and support; and
- (iii) implemented a new confidential reporting portal for providing feedback or raising concerns for employees.

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. During the reporting period we updated the Code to include a requirement for whistleblower protection, and for reporting mechanisms to be accessible and well-publicised.

#### **(f) Additional actions during reporting period**

The following additional actions were also taken, with the aim of continually improving our approach to addressing modern slavery risks in our operations and supply chain.

- (i) Integrated modern slavery-related clauses into the firm's new standard supplier contract template, and commenced the development of responsible sourcing and modern slavery clauses to include in tender templates.
- (ii) Maintained our registration as a Fairtrade supporting workplace, by sourcing Fairtrade certified tea, coffee, sugar and cocoa for use in our staff kitchens.
- (iii) Commenced a review of suppliers of e-waste recycling services, and the development of a protocol for the responsible management of e-waste to address modern slavery and environmental risks.
- (iv) Commenced a process of reviewing third-party recruitment and temporary labour providers and practices, to ensure we are only engaging with reputable service providers.

## **1.6 EVALUATING EFFECTIVENESS OF OUR ACTIONS**

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

To evaluate the effectiveness of our firm-wide actions to assess and address modern slavery risks, we continued to monitor the following quantitative indicators:

- suppliers that were sent a copy of our Supplier Code of Conduct, and that confirmed they understood and met the standards in our Code;
- desktop screening checks and database searches conducted; and
- employees who completed training or attended an awareness raising event relating to modern slavery (see 1.5(c)).

We have also started to monitor the adoption of the firm's standard supplier contract terms, which include modern slavery-related clauses, for new and renewed supplier agreements.

We are committed to regularly reviewing and taking action to improve the effectiveness of our approach. In the previous reporting period we initiated a 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. The working group held meetings during the reporting period with the objective of supporting operational implementation, monitoring progress and reviewing the effectiveness of the firm's responsible sourcing processes.

## **1.7 FUTURE ACTION**

We aim to continually strengthen and improve our approach to assessing and addressing modern slavery risks in our operations and supply chain and we have identified the following areas of focus for future action:

### **(a) Risk assessment and due diligence**

- (i) Continue to regularly review our risk assessment approach to address any new and emerging modern slavery risks and priorities, and changes to our procurement spend and supplier base;
- (ii) Engage our selected third party supplier due diligence platform, and begin using the platform to support our collaboration with direct and indirect suppliers, and the ongoing assessment of modern slavery risks in our supply chain;
- (iii) Continue to review the firm's policy framework to ensure consistency with our responsible sourcing processes.

### **(b) Training and awareness raising**

- (i) Continue to provide training and awareness raising opportunities for our people in relation to the firm's responsible sourcing processes and our mechanisms for raising concerns and resolving issues.
- (ii) Review and update the firm's responsible sourcing and modern slavery e-learning module to incorporate developments in relation to modern slavery risks, processes and legislative requirements.

### **(c) Collaboration**

- (i) Continue to participate in multi-stakeholder initiatives and support sector-led opportunities for collaboration and knowledge-sharing, including through our selected third party supplier due diligence platform.

## **1.8 ADDITIONAL INFORMATION**

Through Allens' pro bono program we contribute to addressing some of the factors that exacerbate risks of modern slavery. Our lawyers provide free legal assistance to a large number of vulnerable individuals without adequate access to publicly funded access to justice, including asylum seekers and people experiencing homelessness.

During the reporting period, we conducted research on cyber sex trafficking in Vietnam as part of the Hagar International project and we continued our funding of the Public Interest Advocacy Centre's Indigenous Justice Project, which includes a focus on compensation for First Nations people who have had

wages withheld or stolen from them over decades of systemic discrimination. We also continued to work with a range of human rights organisations to provide this assistance, including Justice Connect Homeless Law, the Public Interest Advocacy Centre’s Homeless Persons’ Legal Service, LawRight’s Homeless Persons’ Legal Centre, ACRATH and refugee and immigration legal services.

## 1.9 GOVERNANCE AND CONSULTATION PROCESS

The Boards of Allens and Allens Operations Pty Limited 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.

A wide range of stakeholders from across the firm were consulted in connection with the preparation of this statement. The stakeholders include members of the firm’s Office of General Counsel, Finance, People & Development, Business Operations, Information Technology and Marketing & Client Services teams, and relevant staff from the firm’s Vietnam and Papua New Guinea offices.

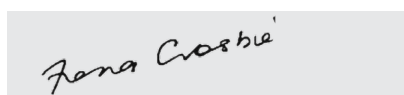
Members of the Board of each reporting entity were given an opportunity to consider and provide comments on the statement prior to approval and publication.

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Mandatory criteria for modern slavery statements <i>Modern Slavery Act 2018</i> (Cth) s 16.	Location of information
Identify the reporting entity.	Introduction
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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 and assessing 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 and assessing modern slavery risks 1.5 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 1.8 Additional information

The Allens Board approved this statement on 24 November 2022 and the Board of Directors of Allens Operations Pty Limited approved this statement on 7 December 2022.

### Signed By:



**Fiona Crosbie**  
Chair, Allens

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**Rod Fielding**  
Director, Allens Operations Pty Limited