

# Modern Slavery Statement

1 July 2023 — 30 June 2024



Maddocks

# Contents

A note from the CEO and Chair of the Board	1
Criterion 1: Identify the reporting entity	2
Criterion 2: Describe the reporting entity's structure, operations and supply chains	3
Criterion 3: Risks of modern slavery practices in our operations and supply chains	4
Criterion 4: Actions we have taken	6
Criterion 5: The effectiveness of our actions	20
Criterion 6: Our consultation process	22
Criterion 7: Provide any other relevant information	23
Continuing improvement: What's next?	24
Approval and signing	26
Statement Annexure: Mandatory Criteria	27
About Maddocks The modern Australian law firm	28

# A note from the CEO and Chair of the Board

At Maddocks, our goal is to make a difference for our clients, each other and the community. Our commitment to human rights is a fundamental part of achieving this goal.

Whether it's the work we do for our clients, the way we engage with suppliers, our pro bono program, or supporting human rights initiatives through our charitable program, Maddocks is committed to upholding and promoting human rights, and acting ethically in everything we do.

Modern slavery is a global and complex human rights challenge faced by governments and businesses alike, and encompasses exploitive practices such as debt bondage, servitude, child labour, forced labour and human trafficking. With an estimated 50 million people around the world living in modern slavery, and approximately 41 thousand people in Australia, the issue demands our attention.

We embrace our obligations as a reporting entity under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**), and recognise the significant role that organisations such as ours can play in preventing worker exploitation.

This is our fifth statement since the introduction of the Modern Slavery Act. It sets out the clear steps that Maddocks has taken during our fifth reporting year (the financial year ending 30 June 2024) to identify, assess and address modern slavery risks within our operations and supply chain.

The steps we have taken this year continue to build on the foundational work completed during our earlier reporting periods, which allowed us to identify modern slavery risks across our supply chain and operations and commence implementing appropriate mechanisms, systems and processes to hold us to account.

## Our commitment to continuous improvement

During this reporting period, we have progressed and achieved a number of items identified as key priorities in our last Modern Slavery Statement. These include:

- continuing with the firm's approach to educate staff about modern slavery in both the Australian and global context through various forms of training and on-hand resources
- establishing a modern slavery external website page that allows current clients as well as potential clients and the wider public to see what the firm is doing to reduce the likelihood of modern slavery occurring within the firm's operations and supply chains. The website outlines the firm's commitment to its reporting obligations under the Modern Slavery Act as well as copies of our latest modern slavery statement and our Supplier Code of Conduct

- drawing on due diligence exercises (in our previous reporting period) to assess and evaluate areas of modern slavery risk within our labour hire suppliers based on responses to the firm's questionnaire
- conducting a physical site visit to our third party outsource service provider, located in South Africa, which we identified as a high priority, due to its increased susceptibility to modern slavery risk given its geographical location.

We also acknowledge that during this reporting period, the Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Bill 2023 was passed and received royal assent in June 2024 to establish the Commonwealth Anti-Slavery Commissioner as an independent statutory office holder. We intend to continue monitoring regulatory developments with interest, including with respect to the statutory review of the Modern Slavery Act, including the Australian Government's review of recommendations following the Report of the statutory review of the Modern Slavery Act by Professor John McMillan AO and the eventual appointment of the Commonwealth Anti-Slavery Commissioner.

We are pleased to report that we have not identified any specific instances of modern slavery in this reporting period. More importantly, we remain committed to a program of continuous improvement in the years ahead, further developing our systems and controls within our business to effectively prevent and manage the risks of modern slavery.

This statement has been approved by Board of Maddocks in accordance with the requirements of the Modern Slavery Act (see [page 26](#)).



**David Newman**

Partner & CEO



**Paul Woods**

Partner & Chair of the Board

# Criterion 1:

## Identify the reporting entity

Section 16(1)(a) of the Modern Slavery Act requires modern slavery statements to identify the reporting entity or entities covered by the statement. This section confirms that Maddocks is the only reporting entity covered by this Statement.

This modern slavery statement (**Statement**) is made by Maddocks ABN 63 478 951 337, Collins Square, Tower Two, Level 25, 727 Collins Street, Melbourne VIC 3008 (referred to as **we, us, Maddocks, the Firm** in this Statement).



## Maddocks

This modern slavery statement (**Statement**) is made by Maddocks ABN 63 478 951 337, Collins Square, Tower Two, Level 25, 727 Collins Street, Melbourne VIC 3008 (referred to as **we, us, Maddocks, the Firm** in this Statement).

Maddocks is a single reporting entity under the Commonwealth *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) and this Statement is submitted and published for the financial year ending 30 June 2024, in accordance with section 13 of the Modern Slavery Act.

This Statement addresses each of the seven mandatory criteria for reporting set out in section 16 of the Modern Slavery Act.



# Criterion 2:

## Describe the reporting entity's structure, operations and supply chains

Section 16(1)(b) of the Modern Slavery Act requires modern slavery statements to describe the structure, operations and supply chains of the reporting entity. This section outlines our structure, operations and supply chains, including the nature of our supply chain at a high level.

### Our Structure








Maddocks is a proudly independent Australian law firm, operating as a partnership. Maddocks currently has 91 partners, and over 680 employees, nationally.

Maddocks wholly owns Maloch Pty Ltd ACN 005 387 100, which is a service entity providing administrative and other support services to Maddocks.

### Our Operations

Maddocks has been providing legal services in Australia since 1885 from our Melbourne office, while we began expanding our operations with the opening of our Sydney and Canberra offices in 2002 and 2012 respectively. Maddocks delivers a broad range of commercial legal services to public and private entities, not-for-profits and individuals throughout Australia and internationally.

Maddocks provides legal advice across a range of sectors and commercial practice areas. Our key areas of expertise include:

-  Banking and Finance
-  Construction
-  Corporate and Commercial
-  Dispute Resolution and Litigation
-  Employment and Workplace
-  Government Advisory
-  Real Estate

In addition to the Firm's core legal services, Maddocks operates Maddocks Recoveries, our debt recovery agency. We have also established Maddocks Foundation, a charitable program which supports community projects and programs by providing annual grants to charitable organisations across Australia.

### Our Supply Chains

Maddocks procures goods and services in the following key categories:

-  Information Technology
-  Premises and Facilities
-  Marketing and Business Development
-  Professional Services
-  Knowledge, Learning and Development
-  Recruitment

The majority of goods and services that we procure come from suppliers based in Australia. Key suppliers are engaged on a long-term contractual basis, while arrangements with smaller suppliers are sometimes short term and ad hoc.



# Criterion 3:

## Risks of modern slavery practices in our operations and supply chains

Section 16(1)(c) of the Modern Slavery Act requires modern slavery statements to describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls. This section describes the key risk areas for modern slavery for Maddocks, which mainly relate to our supply chain.

In this section we identify the 'risks of modern slavery practices', meaning the potential for Maddocks to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.

The Modern Slavery Act defines 'modern slavery' as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services.

In our previous reporting periods, Maddocks completed detailed scoping exercises to identify key areas of modern slavery risk in our operations and supply chain based on Commonwealth Guidance. We have also developed and implemented a comprehensive **Supplier Survey**, targeting those suppliers identified as posing a higher risk, to help identify modern slavery risks in our supply chains and provided the suppliers with further educational pieces on how to identify or address Modern Slavery in their supply chains. We also established our own **Supplier Code of Conduct** which has become a key tool when procuring and entering into contractual arrangements with both new and existing suppliers.

We have used the intelligence derived from our earlier scoping exercises, together with the responses to the Supplier Surveys and subsequent requests for further information from suppliers, to identify the operational and supply chain risks described below. The firm identified our labour hire suppliers as posing a higher risk of modern slavery practices. This is due to the labour hire sector being generally unregulated and therefore having greater susceptibility to modern slavery occurring, as there may be heightened risks of deceptive and exploitative recruiting practices. These **labour hire suppliers** have been considered in more depth during this reporting period (see [Criterion 4](#)). We also acknowledge that the Commonwealth Guidance identifies labour hire companies as higher risk.

We recognise that the risks of modern slavery practices evolve and we will continue to regularly review our business and any material external factors to consider whether there have been any changes to our identified risks of modern slavery practices.

### Risks in our operations

As the key operational functions of Maddocks involve the employment or engagement of staff in our offices in Melbourne, Sydney and Canberra to deliver legal services or support the delivery of our legal services, Maddocks has assessed the risk of modern slavery in its operations as remaining relatively low.

This risk assessment was made on the basis that the legal services profession is strictly regulated, our operations are located entirely within Australia, and the legal framework and our own policies and procedures which regulate conditions of employment of our staff (further described in [Criterion 4 – Actions taken relating to our operations](#)), provide a high level of protection against the risk of modern slavery occurring within our operations.

At this stage, the main area of operations we have identified as presenting a higher risk of modern slavery is our charitable program, which supports community projects and programs by providing annual grants to charitable organisations across Australia. We acknowledge the recipients of our charity program operate in areas which may present higher risks of modern slavery, for example, in marginalised or disadvantaged communities. We continue to build on the steps taken in our previous reporting period to address this operational risk and improve our oversight of this program. Further information about this is outlined in [Criterion 4](#).

## Supply chain risks

Through our review of the responses received for the Supplier Survey and subsequent requests for information, we have identified the following key risks in our **supply chain**:



### Sector and industry risks:

- Electronics and textiles both remain high risk industries globally. We understand that the nature of these sectors in which some of our key suppliers operate means that their workforce is more vulnerable to exploitation.
- Maddocks procures IT equipment including phone headsets, mobile phones, laptops, monitors and accessories.
- Maddocks sources sports uniforms.



### Product and services risks:

Paper and coffee beans are recognised as high-risk products globally. Similarly, services such as cleaning, are also recognised as high-risk.

- Maddocks procures stationery, water bottles and umbrellas, including for marketing purposes.
- Maddocks uses the cleaning services provided by the building management at each of our office sites. Responses to our Supplier Surveys acknowledge that cleaning services have an inherent risk of modern slavery as positions often have lower wages, involve manual labour and are frequently on a casual basis. Workers are also often from migrant, low socio-economic, or culturally or linguistically diverse backgrounds.
- Maddocks procures coffee beans for its in-house café.



### Geographic risks:

Some countries may have higher risks of modern slavery. The *Global Slavery Index 2023* of the Minderoo Foundation ranks countries based on the government response to modern slavery. Maddocks procures goods and services from the following countries, which may present a higher risks of modern slavery:

- **South Africa:** Our outsource provider, providing back office support including word processing, debt recovery, billing support, property development law clerk support and s173 agreement support, is located in South Africa. This supplier has been considered in more depth during this reporting period (See [Criterion 4](#)).
- **China and India:** Our laptop and IT accessory provider has manufacturing sites in China and India. We also source umbrellas, sports uniforms, and branded items such as pens and water bottles, which may be made in China.
- **The Philippines:** One of our IT support suppliers is located in the Philippines.

The Supplier Survey responses indicate that some of our suppliers have sub-suppliers located in high-risk jurisdictions including India, China, Vietnam, South Africa and the Philippines.



### Entity risks:

Some entities may have higher risks of modern slavery because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.

- Generally, labour hire suppliers are recognised as higher risk, given that the industry is largely unregulated and organisations often lack adequate policies and procedures to effectively manage employees.
- The labour hire sector also has heightened risks of worker exploitation through deceptive recruitment practices such as targeting individuals or groups from marginalised or disadvantaged communities and imposing recruitment costs on the workers themselves.
- We use labour hire suppliers to staff a small proportion of roles throughout the firm including secretaries, legal personnel, IT and business administration support. These suppliers have been considered in more depth during this reporting period (see [Criterion 4](#)).



## Criterion 4:

### Actions we have taken

Section 16(1)(d) of the Modern Slavery Act requires reporting entities to describe the actions they have taken to assess and address the risks outlined in the previous section, including due diligence and remediation processes. This section addresses this criterion by detailing the steps taken by us during the reporting period to assess and address modern slavery risks as well as our agreed roadmap.

#### Actions taken in the reporting period

Maddocks recognises that developing and effecting an anti-modern slavery program is an ongoing journey of continuous improvement.



In our fifth reporting period, we have focused on undertaking the following new actions which are summarised below and explained further in [Actions taken relating to our operations](#) and [Actions taken relating to our supply chains](#):

- ✓ **Continuing to provide training and education to staff**, which is fit for purpose, including the roll-out of a new mandatory online training module for all new starters providing context for what modern slavery looks like, both in the Australian context and globally.
- ✓ **Implementing our newly created Risk Assessment Tool** to our procurement team with guidance about how to use it when they are assessing existing or potential suppliers for the supply of goods and/or services to the firm – we intend for the tool to be used during the procurement and vetting stage, to assess the level of modern slavery risks and to determine the appropriate level of due diligence to be conducted if the firm were to onboard the supplier.
- ✓ **Reviewing and evaluating the responses** from our key labour hire suppliers from our Labour Hire Supplier Surveys which we sent out last reporting period. The aim was to ensure that the labour hire suppliers operate with appropriate recruitment processes and employment conditions for their workers. Where responses suggested areas of concern, we further engaged with the labour hire suppliers with a view to educate and assist with improving both our anti-modern slavery processes and theirs, as we have previously undertaken with our other suppliers in our supply chain.
- ✓ **Establishing guidance for supplier site visits and audits** to be used in site visits to higher risk suppliers. The Site Visit Guide is designed to assist our staff in identifying and responding to modern slavery issues and concerns while conducting site visits and supplier audits. The Site Visit Guide is based on related guidance from the Commonwealth Guidance and the UN Guiding Principles on Business and Human Rights.
- ✓ **Conducting a site visit to our third party outsource service provider**, located in South Africa. The aim of the site inspection was to assess the overall working environment of this supplier, including carrying out interviews with a range of staff members, and reviewing any relevant policies procedures and practices. This provider was identified as a high priority by the firm, due to its increased susceptibility to modern slavery risks given its geographical location.
- ✓ **Continuing to implement specific modern slavery clauses** in supplier contracts in a prioritised risk-based way. We have focussed on suppliers which pose a higher risk (e.g., in the IT space) and our more substantial supply contracts where the Firm has a significant ongoing relationship, and therefore more leverage.
- ✓ **Continuing to socialise our Supplier Code of Conduct** with new and existing suppliers in a prioritised risk-based way as well as make our Supplier Code of Conduct available to the public on our public facing internet site.
- ✓ **Establishing an external internet landing page** (on the Maddocks website) to enable current clients, potential clients and the wider public to see the impact the firm is having to reduce the likelihood of modern slavery occurring within the firm's operations and supply chain, as well as the firm's commitment to its reporting obligations under the Modern Slavery Act.
- ✓ **Updating and promoting findings from the latest Global Slavery Index** and considering any implications on our modern slavery risks and actions. We will continue to monitor independent third-party commentary on modern slavery reporting, given the unique insight such commentary provides on strengths and weaknesses of modern slavery reporting.
- ✓ **Continue monitoring and consider any new supplementary guidance** issued by the Attorney General's Department that, if implemented, could assist the firm in remaining in line with 'good practice' trends, where possible.
- ✓ **Updating our modern slavery related policies** to include references and links to the Risk Assessment Tool and our Incident Response Framework. During this period, we also updated our Supplier Code of Conduct with minor changes to ensure further compliance by our suppliers with our code.
- ✓ **Continuing our increased due diligence on charities** sponsored by the Maddocks Foundation through the monitoring and reviewing of articles and news reports.
- ✓ **Continuing our monitoring of the statutory review of the Modern Slavery Act**, including any related developments (such as the establishment of Australia's first federal Anti-Slavery Commissioner), as there are ongoing recommendations and changes to the regulator that may be imposed in future reporting periods.

An overview of the steps we have taken during this reporting period to assess and address the risks in our operations and supply chains, and the existing policies and processes we have in place that can be used to facilitate further risk assessment, prevention and mitigation is on the [following page](#).

## Actions taken relating to our operations

### Management systems and controls

We continue to enjoy the benefit of a cross-functional Anti-Modern Slavery Project team (**Project Team**), to oversee the Firm's modern slavery response. The Project Team includes our Chief Operating Officer, Chief Information Officer, General Counsel, Facilities Manager, Director of People and Culture, and Director of Business Development, Communications & Marketing.

### Modern Slavery on the Maddocks internet site

We launched our modern slavery page, on the Maddocks website in February 2024, for clients, potential clients, external stakeholders and the wider public to be able to see the firm's commitment to modern slavery and the steps we are taking as an organisation to minimise the firm's exposure to modern slavery and its associated risks. The website page allows users to access:

- the firm's latest modern slavery statement;
- the firm's previous modern slavery statements;
- the firm's Supplier Code of Conduct; and
- additional information about the firm's commitment to modern slavery.

We can confirm that there have been **67 page views** during this reporting period, from February 2024 until 30 June 2024.

### Employment practices

We have robust policies and procedures in place for recruitment and remuneration of staff, ensuring compliance with all applicable employment laws and regulations. For all new partners and staff, our onboarding processes includes verification of experience, qualifications, and rights to work in Australia. Staff in support roles, shared services, as well as graduates are covered by the *Legal Services Award*, which is reviewed annually by our People and Culture team to ensure we comply. Lawyers (not including graduates) have their salaries benchmarked against industry standards.

### Incident Response Framework:

The purpose of establishing the Incident Response Framework was to outline a firm wide procedure for reporting and responding to any actual or suspected modern slavery incidents. Upon becoming aware of an incident or potential incident within our supply chains, staff will be able to take appropriate actions to investigate and remediate any actual or suspected modern slavery with the aim of preventing re-occurrence. Hypothetical examples have been provided throughout the Incident Response Framework to assist staff when they are assessing a situation, as well as additional questions to prompt thought. Although there is no one size fits all approach when responding to modern slavery incidents, we have established six key steps for staff to take into consideration:

- Conducting preliminary assessment
- Safeguarding
- Reporting
- Remediation (Suppliers)
- Remediation, rehabilitation and resolution for victims
- Review – learnings.

Not all of the steps above will be relevant to every incident, however they will assist as a practical framework for staff to follow. The Incident Response Framework also contains an incident log template. The template will allow staff to respond to the relevant categories listed above, and compile as much evidence and information as possible to assess the risks, and create a plan to mitigate the current risk and any future risks.

Although the firm has assessed the risk of modern slavery in its operations and supply chains as remaining relatively low, it provides great comfort to our staff and the firm that we have the right tools in place in the unlikely event of an incident.

### Related policies

Maddocks' operations are governed by a formal Code of Ethical Conduct (**Ethical Code**). This Ethical Code is founded on one of the Firm's core values – Integrity. The Ethical Code sets out guidelines to ensure Maddocks conducts its business with the highest standard of integrity and in accordance with all applicable laws and regulations. The Ethical Code also includes processes for reporting unethical or illegal conduct. Our Ethical Code, Procurement Policy, and our Anti-Modern Slavery Policy all include specific references and links to the firm's Supplier Code of Conduct. Our Anti-Modern Slavery Policy has recently been updated to include information about our Incident Response Framework and provide staff with access to the framework, should they need to use it.



### Anti-Modern Slavery Policy

We have continued to raise awareness of Maddocks Anti-Modern Slavery Policy, which complements the firm's Code of Ethical Conduct and Procurement Policy. This Anti-Modern Slavery Policy sets out our approach to ethical sourcing and the prevention of worker exploitation — including modern slavery— within our own business operations and our broader supply chains. The policy explains:

- The concepts of modern slavery in a digestible way;
- The firm's commitment to improving our response to the risks of modern slavery;
- How to identify potential indicators of modern slavery and the risk factors such as geographic risk, high risk industries, and suspicious behaviours;
- Access to the firm's Incident Response Framework for staff to be able to report and respond to any actual or suspected modern slavery incidents.
- The obligation on Maddocks partners and staff to report actual or suspected modern slavery.

### Maddocks charitable program

As outlined in our previous reporting periods, the Maddocks charitable program has been, and continues to be, identified as an area of higher risk, for modern slavery, in our operations. We have continued our due diligence processes for recipients under our charitable program by monitoring for news in the media and using a range of research platforms, including Westlaw and Lexis Advance, to identify any modern slavery risks and incidents connected with these recipients. During this reporting period, **we reviewed 152 articles/news reports related to our grant recipients.** We are pleased to report that no modern slavery incidents have been identified through the review of these articles/news reports or during this reporting period.

Following on from our previous reporting periods, our Maddocks Foundation Grant Application Forms (**Application Forms**), continue to include modern slavery questions. It was evident from the responses to the modern slavery questions, that the majority of the grant recipient organisations are not reporting entities under the Modern Slavery Act. However, the questions prompted many of the organisations to consider whether any modern slavery incidents had occurred within their organisations and what policies or procedures they had in place to safeguard their organisations from any relevant modern slavery risks.

The responses to the questions varied, however many of the organisations outlined that they had, or were willing to adopt, formal policies suitable for the industry in which they operate in e.g., volunteer agreements requiring working with child checks, recruitment policies and risk registers. Several of the organisations stated that the majority of their own suppliers were reporting entities. It was pleasing to learn that our grant recipients were conscious of this, and it is reassuring that their supply chains were complying with modern slavery legislation relevant to them. One applicant also outlined that they have a policy for paying invoices within 48 hours to ensure that the individuals, mainly females, who are providing services are being paid within the shortest possible time, decreasing the chances of modern slavery risks arising.

The insightful responses to the modern slavery questions in the Application Form along with the firm's ongoing monitoring of the recipients, assists in reducing the level of modern slavery risk the firm and its operations are exposed to.

The firm is pleased to report that there were no situations of modern slavery identified, within any of the grant recipient organisations, in this reporting period.

## Actions taken relating to our supply chains

### External labour hire supplier surveys

As we reported in our last statement, the firm is aware that the labour hire sector poses a heightened risk of modern slavery practices, as labour hire organisations are largely unregulated and may lack fundamental workplace policies and procedures. To ensure the firm has a better understanding of this sector, we provided our key labour hire suppliers with a targeted Labour Hire Supplier Survey (**Labour Hire Survey**). The aim of the Labour Hire Survey was to gain a better understanding of how our labour hire suppliers operate, who they employ, how they employ them and the types of policies and processes they have in place regarding employee rights, remuneration and benefits. The questions were tailored for labour hire suppliers to address any relevant and potential risks that the firm is/could be exposed to through the use of their services.

During this reporting period, we reviewed and evaluated the **four** Labour Hire Survey responses we received, in order to assess whether there were any responses that required clarification, areas of concern, or points where we require further information. The aim of the review was to ensure that their operations and employment procedures are fair, ethical and the organisation is operating in a way to mitigate any modern slavery risks.

A summary of the results received is set out below, together with our key observations:

#### 1. Enforcement and compliance:

- **Only one** of the labour hire suppliers is a reporting entity under the Modern Slavery Act.
- **None** of the labour hire suppliers had identified any instances of modern slavery occurring in the last 5 years.
- **Three** of the labour hire suppliers have a responsible person identified for overseeing modern slavery risks within their organisations.
- **All** labour hire suppliers either classified themselves as having “Developed” or “High” visibility of its supply chains.

The above summary demonstrates to the firm that the labour hire suppliers are aware of the obligations they have in relation to modern slavery and modern slavery risks.

#### 2. The nature of the services the supplier provides to the Firm:

- **All labour hire suppliers** identified the type of labour hire services they provide to the firm e.g. Information Technology and Legal Secretarial roles. Each supplier was able to clearly identify the relevant factors that are taken into consideration when they recruit for these roles for example: working rights, certifications/ qualifications, reference and background checks, age, skill sets, benchmarking roles against awards.
- **No low skilled migrant workers** are working for our labour hire suppliers.
- **No third-party** providers are used by our labour hire suppliers.

It is evident that the labour hire suppliers have strict requirements when it comes to employing their own staff as well as during the recruitment process of labour hire workers, given that workers are required to be skilled in the industries for which they are recruited.

#### 3. Contractual arrangements the supplier has with the individuals they employ:

- The labour hire suppliers confirmed that the labour hire workers who are recruited via these methods **all have** written contractual arrangements in place.
- The written contractual arrangements include all of the relevant key terms, for example **remuneration, benefits and working conditions**.
- Given the roles for which the firm recruits, the labour hire suppliers **do not** provide the contractual agreements in any language other than English. The reason for this is because the labour hire workers must meet the minimum standard of English literacy required to be able to perform the roles adequately within the firm.

The responses indicate satisfactory contractual arrangements with labour hire workers.



## 4. Remuneration and benefits

- All remuneration and benefits provided to the labour hire workers are in line with **legal and regulatory requirements** i.e. the *Fair Work Act 2009* (Cth) and in line with industry awards.
- All payments made by the labour hire suppliers are made **directly** to the labour hire workers themselves and not through third parties/indirect methods.
- Worker's remuneration or benefits are **not unlawfully withheld** or deducted by any of the labour hire suppliers.

It is reassuring to see that consideration is given to both legislative requirements and industry best practice when paying labour hire workers.

## 5. Forced and bonded labour:

- All labour hire workers **can terminate their employment** subject to relevant notice periods outlined in their contracts.
- **No personal documents** are held or controlled by the labour hire suppliers and are dealt with under the relevant privacy legislation.
- There are **no mandatory schemes or programs** in which the labour hire workers must participate e.g., for making deposits, savings programs or purchasing products/services requirements from the labour hire supplier.

The responses from the labour hire suppliers were all consistent for this section of the survey. Given the increased risks of cyber security breaches, and exposure of personal information, it is reassuring that the labour hire suppliers are only holding copies of personal documents in line with relevant privacy legislation.

## 6. Whistleblowing:

- All labour hire suppliers have resources to allow labour hire workers to **submit reports anonymously**.
- **3 out of the 4** labour hire suppliers have procedures in place to allow labour hire workers **to report violations, harassment, discrimination** etc.

It is positive to see that the majority of the labour hire suppliers have implemented risk mitigation tools to ensure workers are able to report anonymously and are able to access policies/procedures regarding workplace related issues.

## 7. Overall management of the suppliers own supply chains:

- The **one** labour hire supplier who is a reporting entity **conducts due diligence** on its suppliers to assess modern slavery risks and/or other human rights harms.
- All suppliers used by the labour hire supplier **have written agreements** in place.
- The written agreements impose standards regarding employment, work conditions, discrimination etc and two of the labour hire suppliers' written agreements include specific modern slavery clauses.
- Even though 3 of the 4 labour hire suppliers who were surveyed are not reporting entities under the Modern Slavery Act, there is an understanding of modern slavery risks, and processes have been implemented by the suppliers to address those risks.

Further due diligence was carried out on one of the labour hire suppliers given that they are a reporting entity. We wanted to ensure that the responses they provided to the firm were in line with their organisation's policies and operations both in Australia and worldwide. After completing the further due diligence, the firm was satisfied that the labour hire supplier is undertaking steps in its operations to identify and mitigate any actual or potential modern slavery risks.

Given the comprehensive supplier responses and further due diligence carried out by the firm, and summarised above, we are satisfied that our key labour hire suppliers are managing their operations well and have appropriate regard to modern slavery and the associated risks. Even though the responses indicate that the labour hire suppliers are monitoring and implementing relevant practices to continue minimising modern slavery risks, the firm provided the labour hire suppliers with further educational tools and information to assist them moving forward to address any potential or actual modern slavery risks associated with their operations and the labour hire industry as a whole. We also took the opportunity to provide the labour hire suppliers with a copy of our recently updated Supplier Code of Conduct.



### Guidance for Supplier Site Visits and Audits

During this reporting period, in preparation for a planned supplier site visit, and to create general guidelines that can be used for any future site visits, the firm designed a Supplier Site Visit Guidance document (**Site Visit Guide**). The Site Visit Guide is structured around 5 Key Principles based on best practice guidance from the Commonwealth Government and the UN Guiding Principles on Business and Human Rights. The Site Visit Guide is intended for use by Maddocks staff when conducting supplier site visits, particular for higher risk suppliers, and to assist our staff in identifying modern slavery risks, or areas of concern. Importantly, the document contains practical guidance (supported by illustrative case studies) on what to do in the event that actual or suspected incidents of modern slavery are identified during the site visit, including clear escalation points at Maddocks. The guidance prioritises the health, safety and wellbeing of both Maddocks staff and of the supplier's workers.



### Risk Assessment Tool

As the firm continues to grow, so too does the need for additional suppliers and resources. It became apparent that the firm would benefit from a more structured approach to vetting suppliers (both current and future) for modern slavery risk. In the last reporting period, the firm developed a Modern Slavery Risk Assessment Tool (**Risk Tool**) to be used, predominantly by the procurement team, when looking to procure new suppliers.

The Risk Tool aims to assist staff to identify, at a very high level, whether there are any likely modern slavery risks and the level of due diligence that would be required if we were to enter into an agreement with the supplier for goods and/or services. The Risk Tool is divided into two phases:

- **Phase One (to assess the product/service risk and geographical risk)** aims to categorise the type of goods and/or services the supplier is providing and the countries from which they are procuring these goods and/or services; and
- **Phase Two (to determine the level of due diligence required)** uses the responses from Phase One to determine the level of risk associated with the goods and/or services and whether the Firm can proceed with the supplier with an appropriate level of due diligence (e.g. ongoing monitoring, questionnaires and/or educational tools).

During this reporting period, we successfully rolled out the Risk Tool to our procurement team. The Risk Tool was circulated to all Heads of Departments (including the firm's Chief Information Officer, Chief Operating Officer, Director of People and Culture, Director of Business Development, Communications and Marketing and Head of Finance) along with instructions and guidelines as to how the Risk Tool will be used, and how the relevant teams will play a crucial role in identifying higher risk suppliers for products and/or services through our **two step phase** Risk Tool. The Heads of Department were asked to share the Risk Tool with relevant members of their team who are involved in supplier procurement. We look forward to providing feedback on the Risk Tool in the next reporting period.



### Supplier Code of Conduct

During this reporting period, minor amendments were made to the Maddocks Supplier Code of Conduct (**Supplier Code**) to ensure that it remains relevant and is an accurate reflection of the firm's expectations of our suppliers. The Supplier Code continues to complement the firm's Anti-Modern Slavery Policy, Code of Ethical Conduct, and Procurement Policy by articulating our expectations of suppliers in relation to modern slavery, as well as other ethical, human rights, labour, health and safety and environmental standards.

We continue to update the firm's internal register which contains a list of the suppliers who receive our Supplier Code throughout the reporting period. In this reporting period, **sixteen (16)** suppliers received and agreed to comply with our Supplier Code. This number is a slight increase on the last reporting period (FY22/23 was 14).

The Supplier Code continues to be a crucial step in the firm's ethical procurement processes and the increase in numbers on last year's reporting period demonstrates the firm's ongoing commitment to circulate the Supplier Code to as many of our suppliers as possible. The Supplier Code is also a key way for the Firm to continue raising awareness about modern slavery risks especially for our smaller suppliers who are not, themselves, reporting entities under the Modern Slavery Act and therefore may be less aware of the relevant issues.



### Policies

Ethical procurement is a well-established principle in our procurement processes. Maddocks has a Procurement Policy, Code of Ethical Conduct and Environmental Policy as well as our Risk Tool to assist with procurement. These policies require all procurement to be ethical and to comply with applicable laws and include processes for reporting unethical or illegal conduct. These policies were updated in this reporting period to include specific sections on Risk Tool as well as our Incident Response Framework.





### Supplier vetting and monitoring

Maddocks has identified a number of existing processes used to assess and monitor suppliers, which can be leveraged to assess and address modern slavery risk. For example:

- Reference checking for potential suppliers.
- Completion of a 'request for information' questionnaire for potential suppliers. We have incorporated specific modern slavery due diligence questions into our screening process for potential suppliers in IT and key procurement tenders during this reporting period.
- Our Risk Tool, which will be a vital tool in assisting the procurement team in vetting and monitoring potential suppliers in future reporting periods. The procurement team were provided with instructions and guidelines on how to use the Risk Tool during this reporting period.
- To monitor existing suppliers, Maddocks conducts site visits from time to time, including to overseas sites. During this reporting period, **one** site visit was conducted by, senior staff members, to our third party outsource provider, located in South Africa. Further information about this site visit can be found under **Conducting a supplier site visit** in the following column.



### Conducting a supplier site visit

This reporting period, two senior Maddocks staff members conducted a physical site visit to our third party outsource service provider, located in South Africa over a 5-day period. This supplier provides a range of back-office administrative support services to the firm. We identified this supplier as a high priority, due to its increased susceptibility to modern slavery risks given its geographical location. The Global Slavery Index 2023 reports that there are over 150 thousand people experiencing forced labour or forced marriage in South Africa. This number places South Africa 133rd globally, and 43rd within Africa in terms of prevalence of modern slavery. These country rankings are based on a range of factors including the strength of governance, individuals' access to basic needs, the occurrence of inequality and the effects of conflict in the region.

The aim of our site inspection was to assess the overall working environment of the supplier, and to assess the supplier's policies, procedures and practices in relation to modern slavery risk. Prior to the site visit, we undertook preliminary due diligence by asking the supplier to complete a detailed questionnaire covering topics including supply chain risk, recruitment processes, employment practices, and anti-modern slavery policies and procedures.

Further to the detailed questionnaire, and in preparation for the visit, the Maddocks team was provided with the firm's newly developed **Supplier Site Visit Guide**, to assist them with identifying, and responding to, any indicators of modern slavery during the visit.

The site visit involved an inspection of the supplier's physical premises, the review of various policies and procedure, and meetings and interviews with supplier staff members across a range of roles, from junior administrators through to senior management. A summary of our key findings from the site visit is set out below:

- No specific incidents or signs of actual or suspected modern slavery were identified during the visit.
- The physical office environment is secure, clean and well appointed.





- The supplier has robust recruitment and employment policies and procedures in place to ensure compliance with applicable employment and labour relations laws.
- Responses to the written questionnaire highlighted management’s commitment to the fair treatment, health and safety, and wellbeing of staff. Pleasingly, the observations of the Maddocks Team whilst onsite, and the meetings with various staff, were consistent with this premise. There appears to be a high level of supplier employee satisfaction.
- Only 5–10% of the supplier’s workers are contractors. These workers are sourced either directly or from reputable agencies, and strict onboarding processes are in place.
- Although the supplier is not formally required to report on modern slavery, management demonstrated a comprehensive knowledge of modern slavery risk, particularly the types of risks that are most prevalent in South Africa.
- The supplier has implemented an anti-modern slavery policy and framework to
  - raise awareness
  - review supplier/vendor commitments
  - provide safe method to report incidents
  - define a framework to assess and respond to such incidents.
- Management demonstrated a strong understanding of the importance of prioritising the impact on victims when responding to any potential incident of modern slavery. The supplier’s policies and procedures reinforced this.
- The supplier has mapped its key supply chain and identified outsourced IT functions and IT hardware suppliers as presenting potentially higher modern slavery risk. The supplier has conducted due diligence and engaged directly with these suppliers on modern slavery issues. No incidents of modern slavery have been found.

Overall, we consider that the site visit was productive and beneficial. Being physically present and meeting staff in person provided the firm with an insight into the supplier’s operations that is simply not possible via remote meetings and correspondence. We are satisfied with the supplier’s level of understanding of, and commitment to identify and address, modern slavery risk. We will continue to monitor and engage with this supplier on modern slavery issues in future reporting periods. We anticipate that the efficacy of this engagement will be enhanced by the strengthened relationships between our organisations resulting from our site visit.



### Modern slavery clauses in supplier contracts

Maddocks continues to include modern slavery clauses in new supplier contracts, as well as in any relevant renewal contracts in a prioritised risk-based manner. To remain consistent with the Commonwealth Government's recommendations, we continue to use the suite of developed clauses which are of tiered complexity and are issued according to the level of risk of modern slavery practices occurring in the performance of the contract.

The firm has an internal contracts register which is continually updated to include a list of the contracts that include modern slavery clauses. This internal record allows the firm to quantify the number of contracts entered into in each reporting period. During this reporting period, Maddocks entered into **twenty-nine (29)** new contracts (or contract renewals) that included appropriate modern slavery clauses according to the level of risk occurring in the performance of the contracts. The firm is aware that the IT industry, particularly IT hardware suppliers, are more susceptible to modern slavery risks due to their workforce being more vulnerable to exploitation. During this period, the firm purchased Audio Visual (AV) hardware for the firm's conference/meeting rooms. After a thorough assessment and review of the proposed supplier arrangement, the firm was able to assess the level of modern slavery risk, and include an appropriate modern slavery clause within the contract. The inclusion of the modern slavery clause with this supplier not only allows the firm to mitigate its own modern slavery risks, but ensures that the supplier is aware of its own obligations and encourages the supplier to actively monitor its own risks and exposure to modern slavery.

We will continue to include these clauses in our supply contracts, both new and existing, to further educate our suppliers about modern slavery risk and mitigation, and to encourage suppliers to raise any concerns they may have if modern slavery incidents are suspected.



### Training and education of staff:

During the reporting period, we have:

- **Continued providing new starters with a mandatory online training module** for modern slavery as part of the induction training pack. This training module is interactive and requires staff to complete learning checks at the end of each module to test their understanding. The training module is based on the Australian modern slavery legislation as well as providing relatable and understandable examples of the types of modern slavery that occur in Australia and also on a global scale. We have had **159 new starters**, including legal staff, shared services and consultants, complete this modern slavery training module in this reporting period. Along with this updated training module, new starters must also review and acknowledge the firm's Anti-Modern Slavery Policy.
- **Updated our modern slavery intranet page** as part of our continued efforts to educate our staff about modern slavery. The intranet page is a useful resource for all staff as it brings together all of the work the firm is doing in this space in one place. Staff are able to navigate through the page easily to discover an overview of what modern slavery is, how modern slavery affects the firm, and our legal reporting obligations. We have also included all of the firm's past modern slavery statements and our related policies and procedures, including current articles regarding modern slavery in Australia. There are links to the Global Slavery Index, the firm's training modules on modern slavery as well as a list of frequently asked questions. During this reporting period, the intranet page has had **124 interactions** from staff. This is a large increase on the last reporting period, which is positive to see.
- **Published multiple articles** in the Maddocks firmwide internal newsletter to inform the firm of:
  - our Modern Slavery Statement being published on the Australian Border Force register in the last reporting period
  - a public Instagram and LinkedIn post regarding the publishing of our latest Modern Slavery Statement (with a link for viewers to access)





- our articles providing insight on the evolving modern slavery landscape including the [statutory review of the Modern Slavery Act 2018 \(Cth\)](#).
- **Continue to provide access to our Incident Response Framework** which sets out the firm’s approach to reporting and responding to any actual or suspected modern slavery incidents. The Incident Response Framework also includes a step-by-step process of how to deal with the incident and log appropriate information to create a record for the firm and an action plan to mitigate any further incidents from occurring.
- **Continued to work with our appointed ‘modern slavery compliance champions’** within the firm
  - these include Partners and legal staff who have been responsible over the last six years to be across developments in the modern slavery space and support the activities of our Anti-Modern Slavery Project team and generally help to assist with our Modern Slavery Act compliance.
- **Monitored and reviewed** updates and guidance from:
  - the Australian Government with regard to the recommendations which came out of the statutory review of the Modern Slavery Act aiming to strengthen the Act as well as the royal assent, on 11 June 2024, of the Modern Slavery Amendment (Australian Anti-Slavery Commissioner) regarding the establishment of a Commonwealth Anti-Slavery Commissioner as an independent statutory office holder under;
  - the change in regulator of the Modern Slavery Act from the Australian Border Force to the Attorney General’s Department;
  - the NSW Anti-Slavery Commissioner’s release of its “Guidance on Reasonable Steps”;
  - independent reports into proposed recommendations for amendments to the Modern Slavery Act;

to inform our approach and in our commitment to continuous improvement.

### Benchmarking exercise

Maddocks continues to monitor the modern slavery statements of other law firms, to better understand how others in the legal profession are approaching modern slavery risk, and to inform the continuous improvement of our own compliance plan.



## Case Study

### Site Visit to Third Party Provider in South Africa

We conducted a physical site visit to our third party outsource service provider, located in South Africa. The firm had identified this supplier as a high priority, due to its increased susceptibility to modern slavery risks given its geographical location. The site visit involved an inspection of the supplier's physical premises, the review of various policies and procedures, meetings and interviews with supplier staff members across a range of roles, from junior administrators through to senior management.

In preparation for the visit, we created a Site Visit Guide to assist the attending Maddocks staff with identifying, and responding to, any indicators of modern slavery during the visit. The Site Visit Guide is based on best practice guidance from the Commonwealth Government and the UN Guiding Principles on Business and Human Rights. The Site Visit Guide prioritises the health, safety and wellbeing of both the Maddocks staff and of the supplier's workers, and can be used for any future supplier site visits.

No incidents or signs of modern slavery were identified during the supplier site visit. We are satisfied with the supplier's level of understanding of, and commitment to identify and address, modern slavery risk. We will continue to monitor and engage with this supplier on modern slavery issues in future reporting periods. Significantly, we anticipate that the efficacy of this engagement will be enhanced by the strengthened relationships between our organisations, resulting from our site visit.





## Case Study

### Risk Assessment Tool

During this reporting period, we implemented our Risk Assessment Tool to assist our procurement team, in house counsel, and Heads of Department with assessing our current suppliers as well as any future suppliers for modern slavery risks in a formalised, cohesive and comparable way.

The Risk Assessment Tool is divided into two phases:

#### Phase 1

The first part of the Risk Assessment Tool is used to consider:

- **Product/service risk** – The type of product and/or services that are being procured by the firm and whether they are associated with one of the 7 industries (industrial cleaning, meat works, hospitality, construction, manufacturing, agriculture and fishing) that have been recognised as high-risk globally, including in guidance from the Commonwealth Government of Australia and the Global Slavery Index; and
- **Geographic risk** – The location of the supplier or a supplier's known supply chain and whether it is within a country of high vulnerability or prevalence to modern slavery. To assist, the firm has classified the countries with a vulnerability or prevalence score of **greater than 50**, in accordance with the rankings made by the latest **Global Slavery Index**.

#### Phase 2

The second phase is dependent upon the responses to the first phase. In this phase, the firm takes a risk-based approach to determine the level of due diligence required for this particular supplier based on the whether they are supplying the firm with a high-risk product/service and if consideration needs to be given to any geographical risk associated with the product/service.

Based on the matrix, and the responses to all questions, the firm will classify the supplier from High to Low Risk and take one of three steps:

- Proceed with awareness
- Conduct our own desktop due diligence, including a review of their Modern Slavery Statement (if available); or
- Require the supplier to complete the firm's modern slavery questionnaire, conduct our own due diligence and review their Modern Slavery Statement (if available).

We look forward to our procurement team and in house counsel using our Risk Assessment Tool in the next reporting period and providing the firm with any feedback on how effective the tool has been.

# Criterion 5:

## The effectiveness of our actions

Section 16(1)(e) of the Modern Slavery Act requires modern slavery statements to describe how the reporting entity assesses the effectiveness of the actions being taken to assess and address modern slavery risks. This section addresses this criterion by outlining the steps taken by us during the reporting period to review the effectiveness of our actions to assess and address modern slavery risks.

With the firm making a commitment of continuous improvement to monitor progress of our own modern slavery project through key performance indicators. This reporting period, the firm has both quantitative and qualitative data to demonstrate our progress, which allows for greater oversight and mapping for future reporting periods.

### Quantitive assessment of our actions

#### Modern Slavery KPI's

Key Objective	Key Performance Indicator	Summary of Performance
<b>Employee training and awareness</b> Our online training module aims to provide all new starters to the firm with an overview of modern slavery in both the Australian and global context. This training module is interactive and requires staff to complete 'learning checks' and/or case studies at the end of each module to test their understanding.	The number of staff who have completed the online training module for regarding Modern Slavery.	<ul style="list-style-type: none"><li>– All new starters are required to complete a mandatory online Modern Slavery module designed to outline the Australian legislative requirements and context of modern slavery.</li><li>– <b>158 of our new starters</b> have now completed this mandatory online module in this reporting period.</li><li>– All new starters are required to read and confirm they have understood the firm's Anti Modern Slavery Policy as part of the Modern Slavery induction training program.</li></ul>
<b>Conducted Physical Site Inspection</b> The aim of a site visit is to provide the firm with valuable insights into the way the supplier runs its business, the working conditions of its employees, and its approach to modern slavery risk.	The number of physical site visits that were conducted.	<ul style="list-style-type: none"><li>– The firm undertook <b>one</b> physical site visit of our higher risk third party provider located in South Africa.</li></ul>
<b>Modern Slavery clauses in our supplier contracts</b> We continue to use the suite of developed clauses which are of tiered complexity and are issued according to the level of risk of modern slavery practices occurring in the performance of the contract.	The number of supplier contracts incorporating modern slavery clauses	<ul style="list-style-type: none"><li>– During this reporting period, Maddocks entered into <b>29 new contracts</b> (or contract renewals) that included appropriate modern slavery clauses according to the level of risk occurring in the performance of the contracts.</li></ul>
<b>Acknowledgement and Compliance with our Supplier Code of Conduct</b> We continue to provide our new and existing suppliers with our Supplier Code of Conduct. The Supplier Code sets out the minimum ethical standards and businesses practices we expect from our Suppliers including raising awareness of modern slavery and providing mechanisms for addressing any potential or perceived modern slavery risks.	The number of supplier contracts requiring compliance with our Supplier Code of Conduct.	<ul style="list-style-type: none"><li>– The firm has an established internal register listing the names of the suppliers who have received our Supplier Code.</li><li>– During this reporting period, <b>16</b> suppliers have received and complied with our Supplier Code.</li></ul>

## Modern Slavery KPI's

Key Objective	Key Performance Indicator	Summary of Performance
<b>Our modern slavery intranet page</b> As part of our continued efforts to educate our staff about modern slavery, this intranet page is a useful resource for all staff to have access to as it brings together all of the work the firm is doing in this space in one place. Staff will be able to navigate through the page easily to discover an overview of what modern slavery is on a global scale, what it looks like in the Australian context and access all of our related policies, procedures and frequently asked questions.	The number of interactions on the intranet page.	– During this reporting period we had <b>124 interactions</b> from staff.
<b>Our modern slavery internet page</b> The establishment of our Maddocks modern slavery internet site allows clients, potential clients, external stakeholders and the wider public to be able to see the firm's commitment to modern slavery and the steps we are taking as an organisation to minimise the firm's exposure to modern slavery and its associated risks.	The number of interactions on the internet page.	– Since the launch of the page on 14 February 2024 until the end of the reporting period 30 June 2024 we had <b>67 interactions</b> .
<b>Reporting procedures under our Supplier Code of Conduct</b> Monitoring the number of modern slavery concerns raised under our reporting procedures outlined in our Supplier Code of Conduct.	The number of concerns raised under our reporting procedures.	– There have been no issues or concerns raised by any of our staff, Suppliers or third parties through our reporting procedures.
<b>Monitoring of Maddocks Foundation Grant Recipients</b> As part of our efforts to reduce the risks associated with our Maddocks Foundation through its grant recipients, we set up notifications alerts any time articles/news reports were published on the grant recipients.	The number of articles/news reports reviewed.	– The firm established a register listing the names of the organisations who have received grants through the Maddocks Foundation. – During this reporting period, we reviewed <b>152 articles/news reports</b> . – There have been no issues or concerns identified regarding modern slavery through this review process.
<b>Annual compliance plan</b> To ensure we are tracking in a direction of continual improvement, we monitor our compliance against our annual compliance plan.	The percentage of completion of our annual compliance plan.	– We successfully completed <b>100% of our planned key priorities</b> in this reporting period (as set out in our previous modern slavery statement).

Maddocks intends to periodically review these key performance indicators to determine whether they continue to represent appropriate criteria for measuring the effectiveness of Maddocks efforts to assess and address modern slavery risks. In the next reporting period, we will be able to report on the implementation and use of the Maddocks Risk Tool and if there were any incidents documented using our newly implemented Incident Response Framework.

## Qualitative Assessment of our actions

During this reporting period, we conducted a site visit to our outsource service provider based in South Africa, and engaged with them via both questionnaires and in-person discussions about modern slavery best practice. A useful indicator to the firm that

**Maddocks received the following feedback from a senior member of the supplier organisation about Maddocks engagement with them in relation to our supplier engagement:**

*Thanks very much for generally increasing our organisation's awareness regarding the very real risks of Modern Slavery. At the outset whilst we understand there is not an obligation on us to report under a South African equivalent of the Modern Slavery Act we would like reiterate the fact that our organisation has, throughout this process, increased our awareness of the visibility that our organisation has over our direct and indirect supply chain.*



# Criterion 6:

## Our consultation process

Section 16(1)(f) of the Modern Slavery Act requires reporting entities to describe the process of consultation with any entities that the reporting entity owns or controls. To address this criterion, this section outlines how Maddocks prepared this Statement including consultations with Maloch Pty Ltd.

Maddocks wholly owns Maloch Pty Ltd, which operates as Maddocks' service company. As Maloch Pty Ltd is integrally connected to Maddocks' business, the operations and supply chains of Maloch Pty Ltd have been included in our modern slavery response plan.

Accordingly, any references in this Statement to Maddocks' operations and supply chain include the operations and supply chain of Maloch Pty Ltd.

For the avoidance of doubt, this Statement is a single modern slavery statement by Maddocks, and not a joint statement. Maloch Pty Ltd is not a reporting entity for the purposes of the Modern Slavery Act.

Given Maloch Pty Ltd is integrally connected to Maddocks, including sharing the same key staff across procurement and shared governance and risk assessment structure, it was not necessary to have a formal consultation process.





# Criterion 7:

## Provide any other relevant information

Section 16(1)(g) of the Modern Slavery Act allows for reporting entities to include any other relevant information that the reporting entity thinks is relevant. Based on Government guidance we think it is relevant to outline the impacts of Covid-19 as well as how Maddocks has been contributing to the discussion of modern slavery more broadly.

### The Impacts of COVID-19

We confirm that during this reporting period, there were no COVID-19 restrictions in place in Australia and restrictions also eased globally. The easing of these restrictions allowed the firm to conduct a physical site visit to our third party outsource service provider located in South Africa, which we had anticipated in our last reporting period. This site visit provided the firm with valuable insights into the way the supplier runs its business, the working conditions of its employees, and its approach to modern slavery risk. Further information about this site visit can be seen in our site visit case study on [page 14](#).

### Maddocks thought leadership

Maddocks has taken a keen interest in the prevention of modern slavery, not just in terms of the Firm's own compliance, but more broadly, in terms of how we can assist others in their stance against slavery. We care about human rights and seek to make a practical contribution to raise collective awareness about this important issue. We are committed to educating our clients in this area.

We have a significant anti-modern slavery practice servicing a number of clients. During the reporting period, we published several new resources and articles regarding modern slavery compliance and resources from previous reporting periods remain available on our website.

### The Introduction of the NSW Regime

Maddocks continues to acknowledge that the *Modern Slavery Act 2018 (NSW)* (**NSW Act**) is in force making New South Wales the first state to have a standalone legislation tackling modern slavery.

While Maddocks is not regulated by the NSW Act, we appreciate the NSW Act impacts many of our clients including NSW government agencies and NSW local councils. During the reporting period we have reviewed and monitored the guidance and resources published by the NSW Government, not only to advise our clients but to assist to develop our understanding of modern slavery issues. We have also been monitoring updates from NSW's new Anti-slavery Commissioner, Dr James Cockayne, including his office's release of the Guidance on Reasonable Steps.

We further appreciate that the NSW Act is more than a reporting requirement and requires NSW Government agencies and local councils to take reasonable steps to ensure that the goods and services they procure are not the product of modern slavery. We note that Maddocks is a 'supplier' to NSW Government agencies and local councils and consider that the significant investment we have made into our anti-modern slavery compliance for the purpose of the Modern Slavery Act will be valuable as we continue to service our NSW Government clients.

# Continuing improvement: What's next?

Maddocks is committed to continuing improvement in our stance against modern slavery. We are looking forward to building on the work described in this publication. Our key priorities for the next reporting period are:



**Continued internal training:** We will continue to deliver our mandatory online e-module training for all new starters. We will also aim to discuss the use of the Risk Tool with the procurement team to understand how the Risk Tool is being used and if it has been beneficial.



**Continued education of our staff:** We will continue to keep our staff updated of our own Modern Slavery actions and initiatives, including of our new Modern Slavery Statement.



**Review and analyse supplier surveys for other identified areas of risk** such as cleaning services provided by our building management: the aim will be to ensure that our other higher risk suppliers operate with appropriate recruitment processes and employment conditions for their workers. Where responses suggest areas of concern, we will further engage with these suppliers with a view to educate and assist with improving both our anti-modern slavery processes in our supply chain and theirs, as we have previously undertaken with our other suppliers in our supply chain.



**Continuing to implement specific modern slavery clauses** in key supplier contracts, in a prioritised risk-based way.



**Continuing to circulate our Supplier Code of Conduct** to key existing suppliers and any new suppliers, in a prioritised risk-based way.



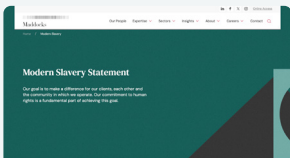
**Continue to review articles and news alerts** for Maddocks Foundation grant recipients to ensure that the higher risk posed is mitigated through constant monitoring and due diligence.



**Monitoring amendments to the Modern Slavery Act:** We will continue to monitor the progress of the recommendations which were made to the Australian Government about amending the Modern Slavery Act. We intend to review and consider any revisions made and take appropriate steps to comply with any additional reporting requirements and obligations imposed on Maddocks as a reporting entity under the Modern Slavery Act.



**Continuing to review findings independent third-party reports on modern slavery reporting:** We will continue to monitor independent third-party reports on modern slavery reporting given the unique insight these reports give on strengths and weaknesses of modern slavery reporting.



**Update our modern slavery related intranet and internet pages** to ensure they include references and links to the latest Statements, and any relevant articles/news alerts regarding modern slavery.



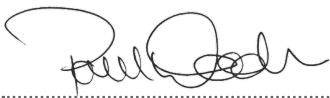
# Approval and signing

Section 13(2) of the Modern Slavery Act requires statements for single reporting entities to be approved by the principal governing body of the entity and signed by a responsible member of the entity. The Commonwealth Guidance states: "It is best practice that the head of the principal governing body signs the statement (for those entities where the responsible member is a member of the principal governing body). For example, if the reporting entity has a board, then the chair of the board or the Chief Executive (if they are a member of the board) should sign your statement." Accordingly, this section outlines how our Statement has been approved by our Board and signed by our Chairman of the Board.

In accordance with Section 13(2) of the Modern Slavery Act, this Statement was approved by the Board of Maddocks (ABN 63 478 951 337) on **16 December 2024**.

The Board is the principal governing body of Maddocks, for the purposes of approving this Statement.

This Board has authorised Paul Woods, Partner and Chair of the Board to sign this Statement.



**Signature**

Paul Woods, Partner and Chair of the Board  
Maddocks, an Australian partnership

16 December 2024

**Date**

# Statement Annexure:

## Mandatory Criteria

The table below sets out the page numbers of our Statement that address each of the mandatory criteria in section 16 of the Modern Slavery Act:

Mandatory Criteria	Page/s
a) Identify the reporting entity.	<a href="#">Page 2</a>
b) Describe the reporting entity’s structure, operations and supply chains.	<a href="#">Page 3</a>
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	<a href="#">Pages 4 – 5</a>
d) 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.	<a href="#">Pages 6 – 19</a>
e) Describe how the reporting entity assesses the effectiveness of these actions.	<a href="#">Pages 20 – 21</a>
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	<a href="#">Page 22</a>
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	<a href="#">Pages 23 – 25</a>

# About Maddocks

## The modern Australian law firm



Founded in 1885, Maddocks works collaboratively with clients to build strong, sustainable relationships – our longest is now more than 100 years old.

Our lawyers aim to deliver consistently high standards of service. We understand the importance of accessibility, responsiveness and transparency.

While we advise across all areas of business and government, we focus on the core sectors of Consumer Markets, Education, Government, Healthcare, Infrastructure, Property Development and Technology.

Our lawyers are regularly acknowledged as leaders in their

field in client legal directories such as Chambers Asia Pacific, Legal 500 Australia and Best Lawyers.

We are also an equal opportunity employer with a commitment to diversity and equality. For the past 20 years we have been recognised as an Employer of Choice for Gender Equality by the Australian Government's Workplace Gender Equality Agency.

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