

Modern Slavery Statement

HWL Ebsworth Lawyers

Year ended 30 June 2024

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Modern Slavery Statement

1. Introduction

This statement (**Statement**) is a statement made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**) on behalf of THE EAST HWL PRACTICE TRUST & THE WARAT HWL PRACTICE TRUST & THE MARIN HWL PRACTICE TRUST & OTHERS trading as HWL Ebsworth Lawyers (ABN 37 246 549 189) (**HWLE**). HWLE is a reporting entity for the purposes of the Act.

This Statement relates to the reporting period commencing 1 July 2023 and ending 30 June 2024 (**Reporting Period**) and sets out the actions taken by HWLE and its controlled entities, HWLE Consulting Pty Ltd (ACN 158 617 497), HWL Ebsworth Pty Ltd (ACN 129 531 611), HWL Ebsworth Leasing Pty Ltd (ACN 130 531 798) (**HWLE Controlled Entities**), to identify, assess and address modern slavery risks within the operations and supply chain of HWLE and HWLE Controlled Entities.

2. HWLE's structure, operations and supply chain

2.1 Legal structure and corporate details

HWLE is Australia's largest legal partnership with origins dating back to the 1890s. It is a firm which operates in 9 locations across every state and territory in Australia.

HWLE's legal structure as a partnership involves a partnership of the practice trusts of each of its 279 partners (as at 30 June 2024).

As at 30 June 2024, HWLE consisted of 200 capital partners, 79 fixed draw partners, and employed another 1,010 legal staff and 370 support staff.

2.2 Operations

HWLE operates within the Australian legal market and predominantly provides legal services and advice to its diverse client base which includes, but is not limited to, government department and agencies, corporate clients across numerous industries, including finance, financial services, insurance, construction, manufacturing, retail, resources, property and high net worth individuals.

HWLE provides a full service, multi-faceted offering across all major areas of commercial law, including Corporate & Commercial, Litigation, Insurance, Property, Construction & Infrastructure, Banking & Finance, Workplace Relations & Safety, Australian Government, State Government and other industry-based practice groups, including Transport, Planning & Environment and Health.

HWLE Consulting Pty Ltd offers consulting services to clients of the partnership, utilising partners and staff seconded from HWLE. HWL Ebsworth Pty Ltd and HWL Ebsworth Leasing Pty Ltd hold HWLE's interests in intellectual property and leases.

2.3 Supply Chain

As HWLE is an Australian-based professional services business, its supply chain does not directly include any product manufacturers, but rather is a simple supply chain consisting of suppliers that provide various goods and services to support HWLE's general operations and to provide support for its technology, systems and infrastructure.

Accordingly, HWLE's supply chain consists of information technology (IT) service providers, suppliers of IT equipment, hardware and software, insurance providers, external consultants, external legal counsel, banks and other financiers, knowledge subscription and media providers, document storage providers, postal and courier services, cleaning contractors, facility managers, travel and accommodation providers, recruitment agencies, hospitality providers, property agents, and suppliers of office and kitchen supplies.

During the Reporting Period, almost all of HWLE's contracted suppliers were based in Australia. HWLE has consistently sought to engage local suppliers, not only to support local Australian business but also in an attempt to reduce the risk of modern slavery in its supply chain. As has been the case for several years, less than 5% of HWLE's suppliers were based overseas, with those international suppliers being based in New Zealand, Great Britain and the United States.

Given HWLE's desire to maintain a disciplined and effective operating and financial model, its relationships with its key suppliers are typically structured as stable, long-term relationships, rather than short-term arrangements.

HWLE's supply chain also consists of a broad range of indirect suppliers that provide goods and services to the suppliers that directly service HWLE. By way of example, these can include the suppliers of parts for photocopiers that HWLE leases, office equipment to HWLE's insurance providers and external consultants, the cleaning equipment providers that provide equipment to HWLE's cleaning contractors and the manufacturers of IT equipment that provide parts to HWLE's IT product and service providers.

3. Risk Profile

HWLE undertook an assessment of its exposure to modern slavery risks prior to preparing this statement. This included a review of HWLE's employment and staff management processes and a review of its business partners and suppliers. A similar analysis has been undertaken in respect of the HWLE Controlled Entities.

HWLE has identified the following key areas of risk in its operations and supply chain during the Reporting Period (which is consistent with previous years' reporting as HWLE's business and operating model has not changed):

- (a) workforce recruitment;
- (b) the suppliers of HWLE's local suppliers (which may include overseas or higher risk suppliers);
- (c) to the limited extent relevant, HWLE's offshore suppliers; and
- (d) IT equipment, hardware and software procurement.

HWLE considers the risk of modern slavery within its operations and supply chain (and that of the HWLE Controlled Entities) during the Reporting Period to be low for the following key reasons:

- (a) the nature of operations of HWLE primarily involves the provision of legal services and advice to clients in Australia, which are services that carry a low risk of exposure to modern slavery practices;
- (b) the primary location of the operations of HWLE is Australia, and all direct suppliers of goods and services are located in Australia or other countries that are rated low for modern slavery practices in accordance with the Global Slavery Index;
- (c) the employees of HWLE consist only of skilled professionals, and not from groups of people where modern slavery is a key risk. The HWLE Controlled Entities do not employ any staff but HWLE Consulting Pty Ltd utilises staff of HWLE under secondment arrangements as required;
- (d) HWLE does not use any labour hire agencies or any short-term contractors, and it only engages a very small amount of foreign staff who are subject to legally compliant Australian employment contracts;
- (e) HWLE has undertaken a comprehensive review of its employment, consultancy and secondment arrangements to ensure that we are in compliance with all legislative and award based requirements;
- (f) HWLE's domestic suppliers (such as suppliers of cleaning services, document storage services and the like) are reputable and well-established, local, and we have a long standing relationship with those parties;
- (g) HWLE understands that its domestic suppliers to be alive to the risk of modern slavery in their operations and supply chain, including the risk in respect of their suppliers, and to ensure they diligence those suppliers appropriately;
- (h) HWLE and the HWLE Controlled Entities procure the majority of their goods and services from well-established, domestic suppliers; and
- (i) the nature of goods and services that HWLE and the HWLE Controlled Entities procure from third party suppliers do not by their nature present a high risk of modern slavery, other than IT equipment, hardware and software as identified above.

Nevertheless, HWLE recognises that it and the HWLE Controlled Entities may be indirectly exposed to a higher risk of modern slavery through their supply chain including the suppliers of its direct suppliers, and seeks to implement processes including through its diligence processes to identify these risks to inform its decision as to whether the supplier should be engaged.

4. Actions taken by HWLE to assess and address these risks

HWLE adopts a number of processes and procedures to assess and address any potential risks of modern slavery within its operations and supply chain (and those of the HWLE Controlled Entities). These processes are detailed below.

4.1 Assessing risks

HWLE continues to adopt processes and procedures to assess the risk of modern slavery, including through a comprehensive process of risk mapping its operations and supply chain on an annual basis. The Management and procurement team consider the risk of modern slavery when making operational decisions and during the process of on-boarding of new suppliers.

4.2 Addressing risks

(a) Responsible Procurement Policy

HWLE has adopted a Responsible Procurement Policy which sets out its objective to engage suppliers that share HWLE's approach to ethics, diversity and sustainability.

The Responsible Procurement Policy provides that HWLE expects its suppliers to comply with requirements including:

- (i) respecting fundamental human rights, including worker representation;
- (ii) adopting ethical business practices with respect to the business behaviour of individuals and the organisation as a whole;
- (iii) having a positive impact on the communities in which they operate;
- (iv) maintaining and evidencing responsible health and safety practices; and
- (v) committing to a comprehensive policy of equal opportunities in employment.

The Responsible Procurement Policy also states that HWLE expects its suppliers to maintain management systems and practices that ensure the prevention of modern slavery, fraud, bribery and corruption.

(b) **Supply contracts**

Where possible, HWLE seeks to incorporate language into the contract to reflect its expectations of the supplier in respect of human rights and ethical procurement.

(c) **Supplier due diligence**

HWLE's procurement team undertake risk based due diligence in respect of all direct suppliers before they are on-boarded. In line with its other social procurement objectives, HWLE also seeks to source goods and services from locally based reputable suppliers, and considers the risk profile and organisational practices of the supplier as part of its procurement strategy.

(d) **Training**

HWLE has a team of modern slavery specialists across the country who are regularly communicating with Management and relevant internal team members to educate them on the matters identified in this statement, including:

- a) the risks of modern slavery in HWLEs operations and supply chain; and
- b) the importance of such team members' seeking to implement processes to identify, assess and address risks of modern slavery in HWLEs operations and supply chain.

Core team members communicate key updates to the firm via the Intranet and it is made known that they are available as key contact points should any internal team member have any concerns or wish to discuss. Each core team member has undertaken in-depth training on managing modern slavery risks.

(e) **Employee Code of Conduct**

In 2024, HWLE adopted an employee Code of Conduct that outlines the acceptable standards of behaviour and expected responsibilities of all HWLE partners, employees and consultants. That Code of Conduct confirms that all HWLE partners, employees and consultants are expected to "identify and report any actual or suspected modern slavery incidents or risks to the Leadership Team".

The Code of Conduct also states that all partners, employees and consultants are expected to read and comply with HWLE policies, including HWLE's Modern Slavery Policy.

(f) **Remuneration arrangements and advice**

The remuneration arrangements of HWLE relate to places of employment within Australia and are based on a combination of award and contractual employment arrangements. HWLE monitors its obligations under the *Legal Services Award 2020* and all other applicable awards and continually obtains industry specific remuneration information to ensure that it pays its employees at or above industry levels. HWLE also ensures that it complies with all relevant

legislative requirements in relation to salary, superannuation contributions and leave.

More broadly, HWLE operates a significant and national team of Workplace Relations & Safety specialists who routinely advise the business itself on the rights of its employees.

All staff seconded to HWLE Consulting are remunerated by HWLE under the arrangements described above.

5. Remediation Actions

HWLE expects complete compliance with its Responsible Procurement Policy and all other firm policies by all partners, staff, contractors and suppliers.

If a supplier was found to be engaging in modern slavery practices or there was a concern that a supplier may be the subject of a risk of modern slavery, HWLE would immediately address the risk with the relevant supplier. If the supplier was not able to demonstrate that the risk has been addressed within a reasonable period of time, HWLE would seek to discontinue its relationship with that supplier immediately.

6. Measuring Effectiveness of the Actions taken

HWLE has implemented practices to measure the effectiveness of the processes it has put in place to identify, assess and address modern slavery risks. Those practices include:

- (a) annual assessment and analysis of supplier activity (for example, whether HWLE has refused to on-board any supplier due to concerns regarding the risks attached to their operations or supply chain, and whether any suppliers have been terminated for such reasons);
- (b) assessment of the nature and extent of notifications through the Employee Code of Conduct (to the extent they relate to matters concerning modern slavery); and
- (c) conducting internal audits of suppliers to determine if mitigation measures have been consistently adopted by such suppliers.

7. Future activities

HWLE continues to critically examine its practices and procedures in respect of modern slavery risk in order to ensure it is implementing appropriate measures that reflect the level of risk attached to its operations and supply chain. HWLE will implement enhancements and new measures as appropriate, during the course of the 2025 reporting period. For example, HWLE is reviewing its protocols in relation to engaging with new suppliers and monitoring the performance of existing suppliers.

HWLE also intends to enhance its existing framework by introducing a Modern Slavery Policy, which will apply to all HWLE Partners, employees and consultants, and by putting in place a Modern Slavery Committee.

8. Consultation with the HWLE Controlled Entities

As the management team of HWLE and the HWLE Controlled Entities are the same, the HWLE Controlled Entities have been directly consulted in respect of the preparation of this Statement and each of the activities described within it. All relevant stakeholders within both HWLE and the HWLE Controlled Entities are aware of and consulted on all practices and procedures described in this Statement, as well as in the preparation of this Statement.

9. Approval

This statement was approved by the Board of Partners of HWL Ebsworth Lawyers (ABN 37 246 549 189) pursuant to the powers delegated to the Board by the partnership under the HWL Ebsworth Partnership Deed on 20 December 2024 and is signed by Jamie Restas, Chair of Partners.

This statement is signed for and on behalf of HWL Ebsworth Lawyers (ABN 37 246 549 189) by its duly authorised representative:

Signed:



Name: Jamie Restas

Title: Chair of Partners

Date: 20 December 2024