

Modern Slavery Statement FY22

1 JULY 2021 – 30 JUNE 2022



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Modern Slavery Statement (FY22)

This statement outlines:

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SECTION 2: Structure, Operations and Supply Chain

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SECTION 1: Introduction

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) by Wotton & Kearney Holdings Ltd (ABN 60 632 647 306) on behalf of itself and its two wholly owned subsidiaries, Wotton + Kearney Pty Ltd (ABN 94 632 932 131) and Pinsani Pty Limited (ABN 84 099 079 802), which operate as part of the Wotton + Kearney group. The statement sets out the actions taken by the Wotton + Kearney group ("Wotton + Kearney") to address modern slavery risks in our supply chains and operations for the financial year ending 30 June 2022, and will be reviewed and updated annually.

This is Wotton + Kearney's first Modern Slavery Statement, pursuant to our obligations under section 13 of the *Modern Slavery Act 2018* (Cth). We have chosen to make a voluntary statement and to take action to address modern slavery risks in our supply chains and operations.



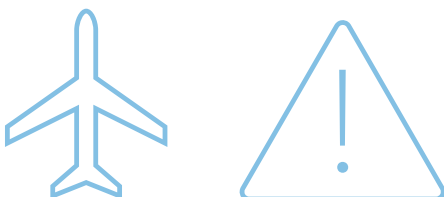
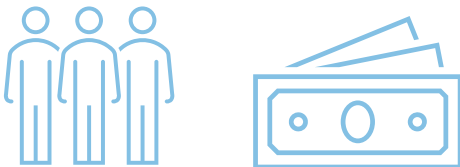
What is Modern Slavery?

Wotton + Kearney is committed to respecting human rights and addressing modern slavery. In 2018 and 2019, Wotton + Kearney partnered with International Justice Mission, the largest anti-slavery organisation in the world, to raise awareness about modern slavery amongst our staff, clients, and broader network. The partnership educated us about the scale of modern slavery – there are more than 50 million slaves globally today – and the importance of a business response.

Modern slavery is a broad concept relating to systematic abuse of fundamental human rights in contemporary workforces. It is generally accepted as encompassing eight types of serious exploitation namely: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or service and the worst forms of child labour.

Modern slavery breaches the most fundamental freedoms and human rights of individuals. Wotton + Kearney rejects all forms of modern slavery and recognises that modern slavery is never acceptable in any of its forms.

Wotton + Kearney has resolved to voluntarily report under the *Modern Slavery Act 2018* (Cth) and to take action to address modern slavery risks in our supply chains and operations.



SECTION 2: Structure, Operations and Supply Chain

Founded in 2002, Wotton + Kearney has grown from two partners to be one of Australasia's undisputed leaders in the provision of legal services to the insurance industry with more than 450 staff across offices in Adelaide, Brisbane, Canberra, Melbourne, Perth and Sydney in Australia. For more information about our services, please [click here](#).

Under the *Modern Slavery Act 2018* (Cth), **Wotton & Kearney Holdings Ltd (ABN 60 632 647 306)** is a reporting entity pursuant to section 5(1). Wotton & Kearney Holdings Ltd is an unlisted public company limited by shares, incorporated and domiciled in Australia.

Wotton + Kearney Pty Ltd (ABN 94 632 932 131) is an incorporated legal practice registered in Australia.

Pinsani Pty Ltd (ABN 84 099 079 802) is a limited company registered in Australia. The principal activity of the group is the provision of legal services in Australia.

Wotton + Kearney Limited (NZBN 9429031331227), is a separately constituted and regulated legal entity registered in New Zealand, with offices in Auckland and Wellington.

Wotton + Kearney procures goods and services for the purpose of providing legal services. The key categories of goods and services in our supply chain include:

- Occupancy of premises and parking
- Computer and IT services
- Business services and products such as printing
- Professional services such as accounting, legal and travel services.

SECTION 3: Modern Slavery Risks in W+K’s Operations and Supply Chain

In partnership with Fair Supply (a global ESG data provider and consultancy), Wotton + Kearney undertook a detailed mapping of its supply chain comprising 289 suppliers with the highest spend amounts. The analysis identified our top 50 suppliers across our top 15 risk industry categories based on spend. Risk was determined based on the industry, amount spent and the geographical location of the products or services. The overall risks of modern slavery occurring in our supply chains and operations have been assessed as being relatively low. However, Wotton + Kearney acknowledges that modern slavery risk exists across all sectors and organisations which may mean it is directly or indirectly exposed to the risk of modern slavery.

The most elevated risk of modern slavery in Wotton + Kearney’s operations and supply chains fall within the industries on the right.

While we have not identified any instances of causing modern slavery, we have identified that through these industries there is potential for us to be directly linked to the following modern slavery risks:

- **Forced labour** – restrictions of movement, intimidation, threats, including human trafficking.
- **Deceptive recruitment practices** – workers promised certain jobs, benefits, or conditions.
- **Child labour** – where children are engaged in hazardous work.
- **Debt bondage** – the payment of excessive recruitment fees or associated costs, and retention of identity documents.

Computer and technical services

Although most of our direct suppliers are based in Australia, in the IT industry work is often sent offshore to less economically developed countries with little visibility over labour conditions.

The risk of modern slavery from IT hardware arises from raw material extraction and from the manufacture of hardware and software, which often relies on low skilled, low paid and vulnerable labour.



Business services

Business services, such as printing companies can face risks of forced labour and child labour associated with the manufacturing of electronic goods in certain countries. In addition, outsourcing and subcontracting creates a heightened risk of vulnerability for workers because there is less visibility and control over the contractual arrangements.



Recruitment services

Recruitment services can pose a risk on employees by:

- restricting workers’ freedom of movement
- withholding, destroying, concealing, or denying access to their workers identification documents, passports, work permits or travel documents
- requiring workers to pay recruitment fees
- using wage deductions as a disciplinary measure



Occupancy of premises and parking

The highest risk categories include cleaning and security services. Examples of risks include:

- the use of foreign workers or temporary or unskilled labour; and
- the procurement of uniforms and other goods potentially manufactured using cotton in countries outside of Australia and New Zealand.






SECTION 4: Actions to Assess and Address Modern Slavery Risks

Our efforts in the financial year ending 30 June 2022 focused on understanding risks and developing a clear policy and due diligence framework for identifying and addressing modern slavery.

Our key actions are as follows:

SECTION 5: Measuring the Effectiveness of our ongoing Modern Slavery Response

The focus of our first year of reporting has been to map and identify potential modern slavery risks and develop appropriate steps to minimise those risks. We will monitor and track our progress through a process of reviews, oversight, and tracking KPIs. KPIs to track actions to address modern slavery include:

<p>Understanding the impact and risk of causing, contributing to or being directly linked to modern slavery</p> 	<ul style="list-style-type: none"> • Mapping our supply chain and analysing it for modern slavery risk • Developing and rolling out a modern slavery questionnaire for our suppliers • Performing risk assessments of new suppliers • Building a modern slavery risk register 	➤	<p>Understanding the impact and risk of causing, contributing to or being directly linked to modern slavery</p>	<ul style="list-style-type: none"> • Number of modern slavery questionnaires completed • Number of new and existing suppliers screened • Assigning suppliers with a risk rating following a risk assessment
<p>Reviewing our policies and procedures</p> 	<ul style="list-style-type: none"> • Developing and implementing a Modern Slavery Policy • Developing a Modern Slavery Grievance Policy • Incorporating modern slavery provisions into new procurement contracts • Developing a Modern Slavery Supplier Code of Conduct which details the expectations of all suppliers to minimise and mitigate risks of modern slavery 	➤	<p>Reviewing our policies and procedures</p>	<ul style="list-style-type: none"> • Number of suppliers who have incorporated modern slavery provisions in contracts and/or our Modern Slavery Supplier Code of Conduct • Annual review of our Modern Slavery Policy and Modern Slavery Grievance Policy • Number of recorded modern slavery incidents, the type of human rights issue raised and the outcome
<p>Building staff awareness and capacity</p> 	<ul style="list-style-type: none"> • Launching an anti-slavery training module for all staff • Delivering tailored training to the Board • Delivering tailored training to key personnel involved in procurement and / or supplier contracts • Creating a modern slavery information page on the staff intranet with links to training, policies, and other resources 	➤	<p>Building staff awareness and capacity</p>	<ul style="list-style-type: none"> • Number and percentage of staff trained in identifying and addressing modern slavery • Number of key personnel who completed targeted training • Number of training sessions conducted (included format and topics covered)

CONSULTATION AND STATEMENT APPROVAL

Because of the shared management and governance of Wotton & Kearney Holdings Ltd, Wotton + Kearney Pty Ltd and Pinsani Pty Ltd, the preparation of this statement was inherently consultative.

In accordance with section 13 of the *Modern Slavery Act 2018* (Cth), this statement was approved by the Board of Wotton & Kearney Holdings Ltd on 27 October 2022 and is signed by David Kearney, Director and Chief Executive Partner.

Signed:



David Kearney
Chief Executive Partner
Wotton + Kearney

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