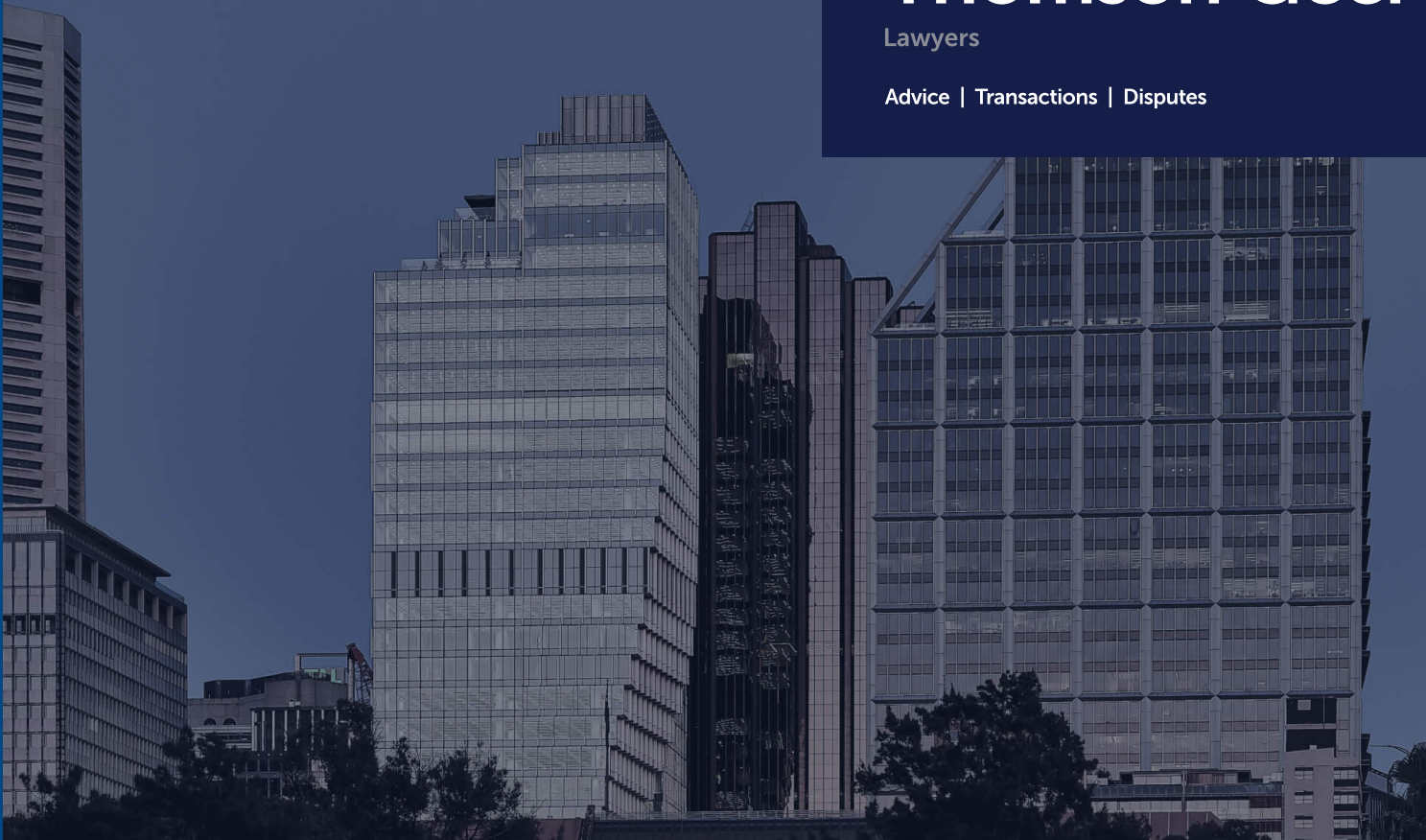

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Thomson Geer Modern Slavery Statement FY 2025

Reporting Period: 1 July 2024 to 30 June 2025

Introduction

This Modern Slavery Statement is made under the *Modern Slavery Act 2018* (Cth) (Act). It describes the actions taken by Thomson Geer and the entities covered by this Statement to assess and address the risks of modern slavery in our operations and supply chains for the FY 2025 reporting period.

Thomson Geer recognises that modern slavery can occur in many forms, including forced labour, servitude, human trafficking, child labour, debt bondage and deceptive recruiting. As a professional services organisation, our direct exposure is generally low; however, risks may arise through third party suppliers and the upstream supply chains that support the goods and services we procure.

Reporting Entity

This modern slavery statement covers the following entities:

- Thomson Geer (a Partnership) ABN 21 442 367 363
- Thomson Geer Services Pty Ltd ABN 74 727 422 472
- TG Legal + Technology Pty Ltd ABN 34 657 374 902

Unless the context requires otherwise, references to "Thomson Geer", "TG", "we", "us" and "our" in this Statement mean the reporting entities collectively.

Structure, operations and supply chains

Our structure and governance

Thomson Geer is a major Australian corporate law firm. We are trusted by companies, governments and institutions to act for their commercial and legal interests. We operate from offices in Sydney, Melbourne, Brisbane, Perth, Adelaide and Canberra and have more than 800 people, including over 155 partners.

The firm structure is a partnership with a Chief Executive Partner and Board, all of whom are ultimately accountable to the partners, the owners of the firm. A National Executive Team reports to the Chief Executive Partner.

Lawyers and professional staff are employed by the partnership. Our shared services function and administrative staff are employed by a services trust, Thomson Geer Services Pty Ltd.

Our team undertaking institutional high volume legal work operates as TG Legal + Technology Pty Ltd. In practice, the team currently acts as a division of the firm.

Our operations

TG is a professional services practice, with our core business activity being the provision of legal services to our clients. Our operations are based in Australia, but we provide legal services to clients located both in Australia and overseas. We also assist a range of clients in developing their approach to modern slavery and provide ongoing advice in this area.

We do not have any employees outside Australia. We comply with Australian workplace laws and associated standards that address wages, conditions, safety and other protections.

Our supply chains

Our supply chain consists predominantly of goods and services procured for the purpose of enabling our people to deliver legal services to our clients. Key categories include:

- Cleaning
- Computer hardware, software and software development services
- Accounting and audit
- Hospitality and catering
- Recruitment
- Marketing, promotional merchandise and events support
- Equipment supply
- Couriers and postage
- Travel, accommodation and taxis / rideshare
- Training at registered training organisations
- Insurance
- Telecommunications
- Parking

We also procure certain services on behalf of clients, including barristers, document management and eDiscovery services, and data rooms.

Risks of modern slavery practices

Overview of risk context

As a professional services firm, TG generally has a lower inherent modern slavery risk profile than many industries. Most of our suppliers are either (a) large Australian organisations that are required to comply with the Act and publish their own modern slavery statements, or (b) small, local organisations providing services wholly within Australia.

Nevertheless, risks may arise in connection with upstream supply chains for goods (for example, electronics and promotional merchandise) and labour-intensive services (for example, cleaning and some facilities services), particularly where tiers of subcontracting are present.

Key risk areas in our supply chains

Supply chain area	Why this area can present risk
Labour-intensive services (cleaning and some facilities services)	Potential exposure to risks such as underpayment, excessive overtime, coercive working arrangements and exploitation, particularly where subcontracting occurs.
Technology and electronics (IT hardware and devices)	Potential upstream risks associated with raw material sourcing and manufacturing in higher-risk jurisdictions, as well as complex multi-tier supply chains.
Promotional merchandise and apparel	Potential risks in textiles and manufacturing supply chains. TG seeks to source ethically, including through preference for First Nations-owned suppliers where appropriate.
Travel and hospitality	Potential exposure through service providers' labour practices and supply chains, including seasonal or casual workforces.
Recruitment and labour hire	Potential risks related to worker vulnerability, recruitment fees, and exploitation if not appropriately managed.

We also recognise that there are residual risks where we have less visibility into second-tier suppliers and source materials behind products and services supplied directly to TG.

Risks in our operations

We consider the risk of modern slavery in our own operations to be zero. Our workforce is based in Australia and we have dedicated HR support across our offices. We maintain policies and training designed to support a safe, inclusive workplace and to ensure compliance with employment and work health and safety obligations.

Actions taken to assess and address risks

Governance and internal accountability

Our Board has responsibility for governance across the business and has oversight of modern slavery risks across our operations and supply chains. Procurement is managed through a central system, supporting visibility of supplier engagement and enabling consistent due diligence practices across the firm.

Policies and standards

We maintain a Modern Slavery Policy that applies to any person or entity working for or on behalf of, or providing services to, or doing business with, TG in any capacity, including suppliers, employees, officers, contractors, subcontractors and consultants. The policy was reviewed and updated during FY 2025 to ensure it remained relevant and effective.

Additional policies supporting our ethical and workplace standards include those covering discrimination, harassment and bullying, and work health and safety.

Supplier due diligence and risk assessment

We apply a risk-based approach to supplier due diligence. This includes:

- risk assessments to identify potential modern slavery risks in supplier chains and distribution networks
- use of supplier assessment including the use of auditing software for relevant suppliers, with mandatory and enhanced scrutiny for higher-risk or higher-spend suppliers
- reviewing suppliers' own modern slavery statements (where they are reporting entities) and other publicly available information where appropriate
- contractual measures where appropriate (for example, supplier commitments to comply with applicable laws and to notify TG of any identified or suspected modern slavery issues)
- targeted engagement with material suppliers supporting TG Legal + Technology, reflecting the volume and nature of services delivered by that part of the practice

In FY2025 we increased the use of our auditing software and otherwise continued to focus on rationalisation of our suppliers and targeted engagement with material suppliers and those supporting TG Legal + Technology.

Ethical sourcing and First Nations supplier engagement

As part of our Reconciliation Action Plan, we review supply arrangements to prefer First Nations-owned and operated suppliers where appropriate, as one component of ethical sourcing. This has included engagement of an independent Aboriginal-owned and operated supplier for promotional merchandise and apparel.

Training and awareness

Modern slavery awareness is included in our training and capability development. This includes:

- annual training for staff on relevant workplace policies and expectations
- modern slavery as a topic in continuing professional development sessions for professional staff
- targeted awareness for staff involved in procurement, supplier management and onboarding, including how to identify and escalate risk indicators

Grievance and remediation

We target zero tolerance for any form of exploitation in our operations or supply chains. If a concern is raised or a potential modern slavery risk is identified, TG's escalation processes are intended to support timely assessment and response. Depending on the circumstances, options available to us are:

- engaging with the supplier to seek clarification, evidence and corrective action plans
- requiring remediation steps and timeframes, including addressing any harm to affected workers where possible
- suspending or terminating supplier engagement where remediation is not possible or acceptable
- considering referrals to relevant authorities or specialist support services as appropriate
- reviewing internal controls to prevent recurrence

Assessing the effectiveness of our actions

TG is committed to assessing and improving the effectiveness of its approach to modern slavery risk management. We implement an annual review of the arrangements in place to address modern slavery risks in our operations and supply chain.

Our FY 2025 review considered (among other things):

- the status and outcomes of supplier due diligence activities (as above)
- feedback from business areas that engage with suppliers, including TG Legal + Technology
- training completion and awareness outcomes for relevant cohorts
- whether our Modern Slavery Policy and related procedures remained fit for purpose

Consultation

The entities covered by this document are closely integrated in practice. Consultation for FY 2025 occurred through the firm's governance and operational structures. There was also consultation with representatives from Thomson Geer Services Pty Ltd and TG Legal + Technology Pty Ltd to confirm supplier categories and any identified concerns.

Other relevant information

Legal services and client support

TG recognises its position to assist clients with their own approach to modern slavery. We have assisted a range of clients in developing their business' approach to modern slavery, including helping them understand how to assess and address risks in their operations and supply chains.

Corporate social responsibility, pro bono and inclusion

While the following initiatives do not directly address modern slavery risks, they reflect our broader commitment to human rights, ethical business conduct and access to justice. TG participates in corporate social responsibility initiatives and is a member of the Australian Legal Sector Alliance, which focuses on sustainability and responsible governance across the legal sector.

TG is a signatory to the National Pro Bono Resource Centre's aspirational target of 35 hours of pro bono legal work per practitioner per year. We support a range of organisations through pro bono work and participate in structured referral programs such as Justice Connect and Homeless Persons Legal Service.

We maintain diversity and inclusion initiatives across the firm, including adoption of the Law Council of Australia's Equitable Briefing Policy.

Continuous improvement priorities

During the next reporting period, we intend to strengthen our approach through actions such as:

- improving supplier questionnaire response rates through earlier engagement, clearer expectations and follow-up
- increasing the use of contractual measures and introduce supplier attestations for material suppliers to TG Legal + Technology Pty Ltd
- enhancing record-keeping and reporting to support clearer measurement of effectiveness over time
- continuing training and awareness activities for relevant cohorts

This Statement was approved by the Board of the Partnership of Thomson Geer and is signed by the Chief Executive Partner in accordance with the requirements of the Act.

Adrian Tembel
Chief Executive Partner
22 December 2025

