
Colin Biggers & Paisley
Modern Slavery Statement

2020/2021

This statement is made pursuant to sections 13 to 16 of the *Modern Slavery Act 2018 (Cth) (Modern Slavery Act)* for the financial year ending 30 June 2021. This is Colin Biggers & Paisley's second statement under the Modern Slavery Act.

This statement is made following consultation with each reporting entity and has been reviewed and approved by the Board of Colin Biggers & Paisley as required by section 16(a) of the *Modern Slavery Act*.

Unless otherwise indicated, all information below is for the second reporting period from 1 July 2020 to 30 June 2021 (**Reporting Period**).

The headings below reflect the criteria required by the *Modern Slavery Act*.

Reporting entity

This Modern Slavery Statement is made on behalf of the following entities for the Reporting Period:

- CBP Lawyers Holdings Limited
- Colin Biggers & Paisley Limited
- Denizo Pty Ltd
- CBP Consulting Pty Ltd
- Quick Convey Pty Limited

The reporting entities are referred to collectively in this statement as “**Colin Biggers & Paisley**” (we / us / our).

During the Reporting Period, we actively engaged and consulted with representatives from all of our reporting entities to identify suppliers, to provide updates on the steps being taken to respond to modern slavery requirements, to receive feedback on action implemented, and to outline planned future action.

The modern slavery risks related to the operation and supply chains of each entity have been identified, addressed and assessed as part of our response.

About Colin Biggers & Paisley

Colin Biggers & Paisley is an Australian legal practice that provides legal services to clients in our chosen markets and fields of expertise. We are proud of our history which dates back to 1900, when Colin Biggers & Paisley was established. Since then, a lot has changed. In 2012, Colin Biggers & Paisley merged with Melbourne-based insurance firm Monahan + Rowell, and in 2013, merged with Brisbane-based firm Hemming + Hart. Through these mergers and a vision for growth, Colin Biggers & Paisley has expanded to a national legal practice with over 490 employees and offices on the east coast of Australia.

We have built a dynamic culture of innovation, opportunity and balance. It applies to the solutions we create for our clients and the careers we build for our people. Against this focus, we operate to a strategic purpose: to collectively build and secure the future of our clients, colleagues and community. We support this through our values of collaboration, balance, respect and loyalty, to ourselves, our clients and the society around us.

We are proud of our long-standing relationships with many of Australia's most respected and successful companies. We are the lawyers of choice in the construction, property and insurance industries and maintain a strong presence across a wide range of other areas, delivering solutions to clients that cover a broad selection of business sectors and legal applications.

Our exceptional people and an unrelenting commitment to our clients have taken Colin Biggers & Paisley from strength to strength over the last century. We undertake some of the most pro bono hours of any major Australian law firm and are striving to be leaders in diversity and inclusion. We are proud of the impact our practice has on our clients, the law and the community.

We wholeheartedly support the *Modern Slavery Act* and its aspirations to eradicate modern slavery, wherever it may occur, and to raise public awareness of the issue.

We are committed to achieving the highest standards of professionalism and ethical behaviour in the conduct of our business and our activities. We support and respect the protection of internationally proclaimed human rights and endeavour to ensure Colin Biggers & Paisley is not complicit in human rights abuses. We are committed to taking steps to ensure that slavery and human trafficking play no part in our own business or our supply chains.

Our Operations and Supply Chain

Colin Biggers & Paisley's principal activity is the provision of legal services to our clients. Colin Biggers & Paisley Limited, as the only entity with employees, employs 490 professional staff who work from offices in Sydney, Melbourne and Brisbane. The risk of modern slavery occurring in our own operations is very low, as we directly engage highly skilled professional staff under employment agreements.

We are committed to operating our business lawfully and ethically and only working with suppliers that are aligned with our values. We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery, human trafficking and child labour. We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection and staff inclusion and diversity.

Our supply chains consist primarily of the provision of professional support services to support our partners, lawyers and employees in their work, and office facilities. Its key components supply us with:

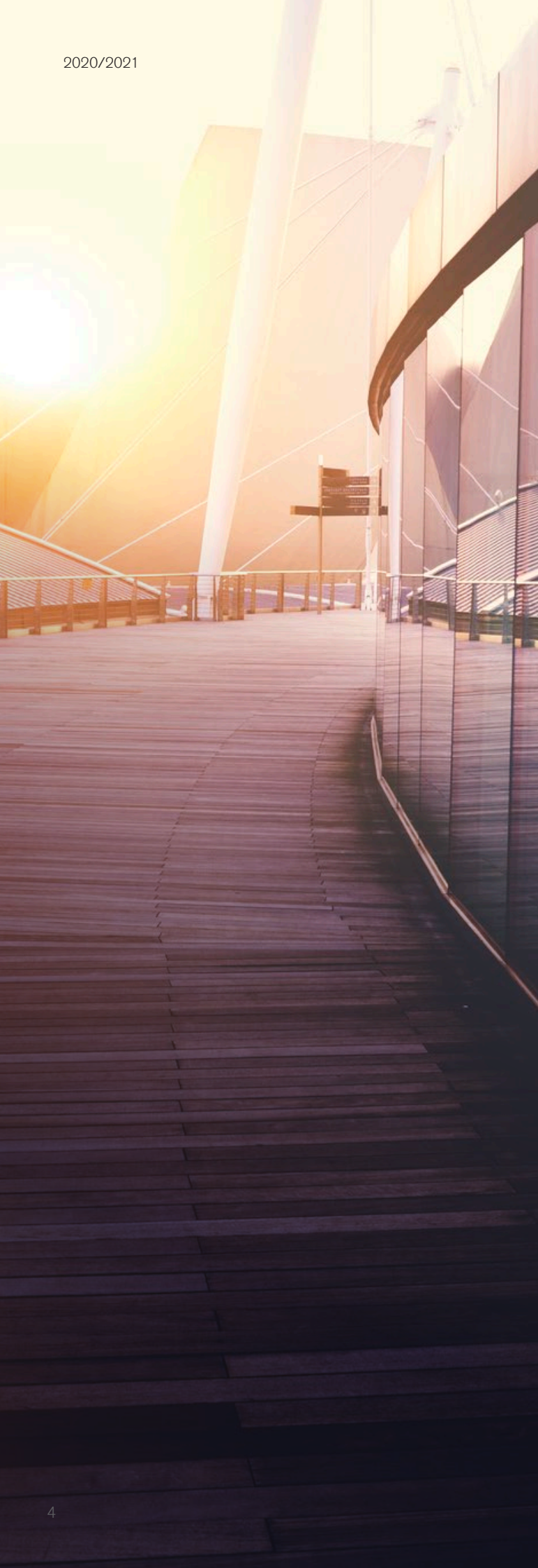
- **REAL ESTATE:** the offices we work from;
- **TECHNOLOGY:** the IT hardware and software and print services that support our business;
- **BUSINESS SERVICES:** the products we buy into in our offices, for example, furniture, stationery and marketing items as well as the services we use in our offices such as catering, security and cleaning;
- **TRAVEL SERVICES:** organising and booking our travel and accommodation requirements; and
- **PROFESSIONAL SERVICES:** such as external training services, external consultants and contractors and legal support services.

Our modern slavery supplier engagement data shows the head offices for 85% of our direct suppliers are in Australia. Other countries of operation are:

SUPPLIER COUNTRIES OF OPERATION



Engagement with second tier suppliers is included in our future planning.



Modern Slavery Risk Assessment

During the Reporting Period, Colin Biggers & Paisley built on its foundational responses set out in our first Modern Slavery Statement.

The assessment of modern slavery risks continued to be overseen by our Modern Slavery Working Group (**MSWG**). The MSWG included representatives from the responsible business, office services and procurement, and risk and compliance teams, and met regularly to ensure work was progressing and to discuss and resolve issues that arose.

During this Reporting Period, the MSWG completed a thorough mapping of the supply chain, spend, and categorisation of suppliers. This led to a clearer identification and assessment of risk areas, which then provided a framework for our engagement with suppliers and priority areas to focus our due diligence and risk management efforts.

The process for risk assessing our suppliers was based on the supplier's self-reported information about:

- the type of product or service provided and procured;
- sector of operation;
- the geography of supply;
- steps taken to understand modern slavery risks within their own operations; and
- any known supplier-specific issues.

Where a supplier had already made public its own Modern Slavery Statement, this was reviewed to provide further context.

We continued our targeted risk-based approach, engaging with our immediate suppliers, commencing with those considered likely to be of higher risk due to their sector of operations or goods and services provided. By engaging with our immediate suppliers, we understand:



We acknowledge that there are additional modern slavery risk areas across our procurement activities beyond the high risk areas identified in this Modern Slavery Statement. Future Modern Slavery Statements will consider these, and seek to provide a more detailed level of analysis, in addition to building on our current response.

Modern Slavery Risk Response

During the Reporting Period we initiated our first steps in responding to modern slavery risks. Each reporting period we aim to build on this initial work to increase maturity and sophistication of our modern slavery responses.

In this Reporting Period, we conducted the following actions to address our modern slavery risks:



COMMENCED A REVIEW OF OUR PROCUREMENT CONTRACTS TO INCLUDE MODERN SLAVERY CLAUSES



DEVELOPED A SUPPLIER CODE OF CONDUCT



DEVELOPED AND ROLLED OUT A SUPPLIER QUESTIONNAIRE TO ALL TIER 1 SUPPLIERS



DEVELOPED AND ROLLED OUT AN INTERNAL MODERN SLAVERY ONLINE TRAINING MODULE TO STAFF



MADE OUR BOARD AND SENIOR MANAGEMENT AWARE OF OUR MODERN SLAVERY OBLIGATIONS

PROCUREMENT AND SUPPLIER DUE DILIGENCE

We developed and introduced a Supplier Code of Conduct which set out the minimum standards of behaviour expected from a member of our supply chain. Our Supplier Code of Conduct requires contractors and suppliers to responsibly manage the risk of modern slavery within their business and their own supply chain and to act in a manner that reflects a commitment to ensuring human rights.

We commenced updating our supplier contract terms to include:

- compliance with all applicable Modern Slavery laws, regulations, and our Supplier Code of Conduct. These terms covered, amongst other things, labour and workplace management; child, forced and involuntary labour; fair pay and working conditions; and training, learning and development opportunities;
- supplier commitment to our Supplier Code of Conduct (and the modern slavery obligations within our Supplier Code of Conduct).

TRAINING

We developed a targeted awareness and education program for staff who make procurement decisions on behalf of Colin Biggers & Paisley. These staff members were required to attend training to understand the requirements of the Modern Slavery Act, our policies and procedures, and our supplier approval process. We will review our training sessions annually to ensure they continue to address all legislative requirements and the practice's advances in our modern slavery response.



We willingly provide commitments to our own clients to take steps to combat modern slavery in our supply chains

POLICIES AND PROCEDURES

During the Reporting Period we undertook a modern slavery review of our governance, policies and procedures. Our review resulted in the following policy documents either being introduced or updated and republished:

- **Modern Slavery Policy** - stating our no-tolerance approach to modern slavery or any form of discriminatory or exploitative behaviour and treatment, whether within our own practice or those who supply us;
- **Supplier Code of Conduct** - setting out the conduct that we expect of our contractors and suppliers, and explicitly states that we will not tolerate slavery or human trafficking. Suppliers are required to engage and manage people ethically and to comply with all laws, regulations and standards, including in relation to human rights, such as not engaging in or being associated in any way with any form of human trafficking, exploitation, forced labour, or child labour;
- **Our Whistleblowing Policy** - allowing staff to raise any concerns that they may have about any individuals or organisations that Colin Biggers & Paisley interacts with, whether they be clients, suppliers, or others.
- **Purchasing Policy** - providing for a pre-approval process requiring due diligence, including modern slavery aspects, of all new suppliers.

REPRESENTATIONS TO CLIENTS

Colin Biggers & Paisley recognises our role in the supply chain when seeking to provide our services to existing and potential clients. We willingly provide commitments to our clients to take steps to combat modern slavery in our supply chains and to work with them, as required, to make a positive change.



Review and assessment of the effectiveness of our actions to identify and address modern slavery risks in our operations and across our supply chain is an ongoing and evolving process that we are committed to.

Assessing the Effectiveness of our Actions

Colin Biggers & Paisley recognises that assessing the effectiveness of our actions to address modern slavery risks in our operations and supply chains is essential. To date, our tier one supplier due diligence and risk assessment has not identified evidence of modern slavery to necessitate action or remediation in our supply chain, however, we remain vigilant.

Review and assessment of the effectiveness of our actions to identify and address modern slavery risks in our operations and across our supply chain is an ongoing and evolving process that we are committed to. The MSWG is responsible for assessing the effectiveness of actions taken to identify and address modern slavery. The actions taken to date, which are described in this document, all contribute directly and indirectly to Colin Biggers & Paisley's modern slavery prevention program. We recognises that the effectiveness of these actions will need to be monitored and that the MSWG must continue to develop its program and response in this space.

Our methodology, risk assessment and supplier due diligence will be subject to ongoing reviews. A key focus throughout FY22 will be further development and continuous improvement, as discussed further below, in key areas including training, due diligence, and ongoing engagement with our suppliers.

Continuous Improvement

Over the coming reporting periods, Colin Biggers & Paisley's continuous improvement activities include plans to review, monitor and embed our processes by:



assessing the number of our suppliers who have adopted a human rights or modern slavery commitments, whether by agreeing to our Supplier Code of Conduct or otherwise



issuing our Modern Slavery Questionnaire beyond Tier 1 suppliers



assessing the results from the Modern Slavery Questionnaire to ascertain patterns, trends and changes in risk profiles



identifying suppliers requiring further due diligence after receipt of their Modern Slavery Questionnaire responses



continuing engagement with suppliers to monitor their ongoing responses to modern slavery risks within their operations and supply chain



considering the modern slavery statements of suppliers and prospective suppliers (where available) when making procurement decisions



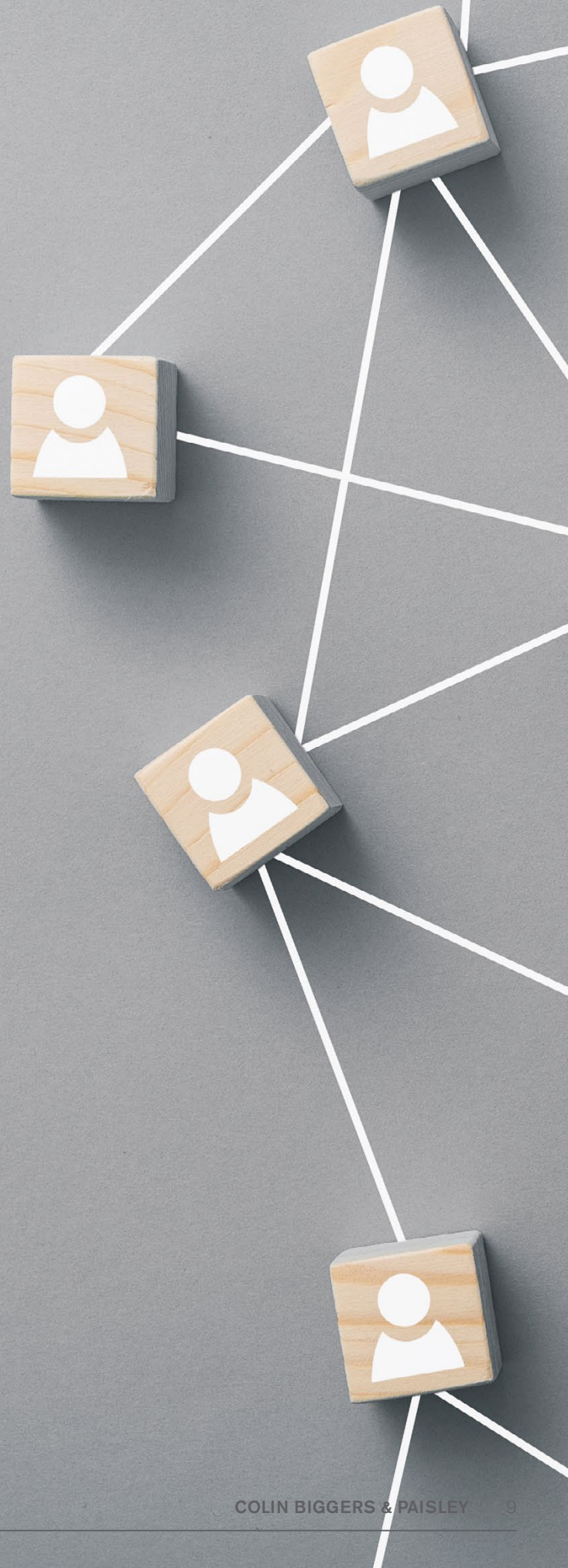
developing remediation plans in conjunction with our supplier(s) as and when required



rolling out modern slavery training more broadly within the practice



monitoring reporting channels for any reported instances of human rights impacts in our operations and supply chains





Consultation and Approval

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018 (Cth)* and has been reviewed and approved by the principal governing bodies of the following reporting entities:

- CBP Lawyers Holdings Limited - 21 December 2021
- Colin Biggers & Paisley Limited - 21 December 2021
- Denizo Pty Ltd - 21 December 2021
- CBP Consulting Pty Ltd - 21 December 2021
- Quick Convey Pty Limited - 20 December 2021

This statement is signed by Nick Crennan, a responsible member of each of the reporting entities, and Managing Partner of Colin Biggers & Paisley Lawyers.



NICK CRENNAN
Managing Partner

Colin Biggers & Paisley

ANNEXURE A

Mandatory Criteria

SECTION 16 MANDATORY CRITERIA	REPORT PAGE NUMBER/S
Identify the reporting entity.	02
Describe the reporting entity's structure, operations and supply chains.	02/03
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	03/04/05
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.	06/07
Describe how the reporting entity assesses the effectiveness of these actions.	08
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	02



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