

Maddocks Modern Slavery Statement

1 July 2022 — 30 June 2023



Maddocks

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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, the issue demands our attention.

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

This is our fourth statement since the introduction of the Modern Slavery Act. It sets out the clear steps that Maddocks has taken during our fourth reporting year (the financial year ending 30 June 2023) 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 internal intranet page that has up to date resources, and the firm's anti-modern slavery related policies and procedures, including our newly created Incident Response Framework which will assist staff members to identify, assess and report any actual or suspected modern slavery incidents
- drawing on due diligence exercises (in our previous reporting period) to identify our labour hire suppliers as a key area of risk within our supply chain
- subsequently engaging with our labour hire suppliers using tailored survey questions, 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.

We also acknowledge that the Modern Slavery Act is under review and that the Attorney General's Department has taken over as regulator of the Modern Slavery Act. We intend to monitor and follow regulatory developments with interest, including with respect to the statutory review of the Modern Slavery Act.

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 23](#)).



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

Maddocks is a single reporting entity under the Commonwealth Modern Slavery Act and this Statement is submitted and published for the financial year ending 30 June 2023, 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 660 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 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.

In this reporting period, the firm identified our **labour hire suppliers** as posing a higher risk of modern slavery practices. The labour hire sector is generally unregulated and has greater susceptibility to modern slavery occurring as there may be heightened risks of deceptive and exploitative recruiting practices.

Further, during this period we consulted with various business groups within the firm to review and update our key supplier list to ensure it remains up-to-date and accurate. There were changes made to suppliers throughout the different business groups, however no further high risk suppliers were identified beyond those outlined on [Page 5 Supply Chain Risks](#).

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 have taken further steps in this reporting period to address this operational risk and improve our oversight of this program, as 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 word processing, debt recovery, property development law clerk support and s173 agreement support, is located in South Africa.
- **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.



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 fourth 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.
- ✓ **Engaging with our key labour hire suppliers** through Labour Hire Supplier Surveys to gain a better understanding of how they operate, who they employ, how they employ them and the types of policies and processes they have in place with their employees to reduce the likelihood of modern slavery occurring within their organisations;
- ✓ **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. For example, in this reporting period we entered into a large contract for the supply of printers and printer equipment across all three of the Firm's offices. We considered this contract as higher risk as the supply chain of the supplier may be one more susceptible to modern slavery.
- ✓ **Continuing to socialise our Supplier Code of Conduct** with new and existing suppliers in a prioritised risk-based way;
- ✓ **Designing and establishing a Risk Assessment Tool** to be used when assessing existing or potential suppliers for the supply of goods and/or services to the firm. The tool will be used during the procurement and vetting stage, to assess the level of modern slavery risks present and determine the appropriate level of due diligence to be conducted if the firm were to onboard the supplier;
- ✓ **Establishing an internal modern slavery intranet page** for educational and training purposes for all of the firm's staff that includes up to date resources, previous modern slavery statements and all the relevant Maddocks modern slavery policies and procedures;
- ✓ **Developing and publishing an Incident Response Framework** to assist our staff in being able to identify, respond and report any known or suspected incidents of modern slavery that are suspected or have occurred in our supply chain;
- ✓ **Continuing our increased due diligence** on charities sponsored by the Maddocks Foundation.
- ✓ **Continuing our monitoring of the Modern Slavery Act** 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, Head of Knowledge, Facilities Manager, Director of People and Culture, and Director of Business Development, Communications & Marketing.

Modern slavery intranet page

We launched our modern slavery intranet page to continue the firm's objective of raising awareness within the firm about modern slavery. The intranet page allows staff to access materials about modern slavery at their own convenience, and contains a range of insightful information and resources including:

- the firm's reporting obligations under the Modern Slavery Act
- the firm's previous modern slavery statements
- general information about what modern slavery is, and what it looks like from an Australian perspective and on a global scale
- current articles in the media and useful resources about modern slavery
- the firm's modern slavery related policies and procedures, including our Anti-Modern Slavery Policy, Supplier Code of Conduct and the newly established Incident Response Framework
- a comprehensive section on frequently asked questions.

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 the industry.

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.



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
- the obligation on Maddocks partners and staff to report actual or suspected modern slavery.

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. We will consider updating our related policies in the next reporting period to include our newly established Risk Tool and Incident Response Framework.

Maddocks charitable program

As outlined in our previous reporting period, Maddocks charitable program has been, and continues to be, identified as a potential 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. We are pleased to report that no modern slavery incidents have been identified.

The Maddocks Foundation Grant Application Forms (**Application Forms**) this year, included the modern slavery questions which we introduced in the previous reporting period. 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.

Several responses outlined that, although it was not a specific Modern Slavery policy, the organisation had child safeguarding protection policies in place given the industry they work in. Some also had Codes of Conduct for both staff and volunteers to sign and adhere too as well as a prevention of abuse policy to explicitly outline how staff are to behave. One applicant also outlined that they run annual training that covers different signs of abuse and modern slavery including how to identify and report abuse, harassment, and discrimination.

The positive 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

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. In our previous reporting periods our suppliers, who were classified as higher risk in our direct supply chain, were provided with Supplier Surveys and numerous educational tools to assist the firm in vetting them as suppliers and assessing their modern slavery risks. In this reporting period, our labour hire suppliers were provided 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.

Questions were tailored to address any relevant and potential risks that the firm is/could be exposed to through the use of labour hire suppliers. The questions were divided up into seven categories with each category focusing on a different area of risk:

- enforcement and compliance
- the nature of the services the supplier provides to the Firm
- contractual arrangements the supplier has with the individuals they employ
- remuneration and benefits
- forced and bonded labour
- whistleblowing

- overall management of the suppliers own supply chains.

The majority of the questions required a Yes or No response and for all of the questions, we allowed space for the supplier to provide further information.

In consultation with the People and Culture team, we identified the firm's top **five** labour hire suppliers that are engaged, by the firm, on a regular basis to assist with filling a range of roles including secretaries, legal personnel, IT and business administration support. The Labour Hire Surveys were sent out via email to the main contact at each organisation accompanied with an overview of why the firm was seeking responses to the questions and our reporting obligations under the Modern Slavery Act.

We received a total of **four (80%)** comprehensively completed Labour Hire Surveys back, which the firm will review in the next reporting period. We propose to evaluate the quality of the responses and assess whether there are any categories of the survey that require clarification or further information in the next reporting period. The aim will be to ensure that these suppliers' operations and employment procedures and the way they run their organisations are fair, ethical and they are mitigating any modern slavery risks. We may ask a further set of questions and/or provide the labour hire supplier with some educational tools 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.

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. Accordingly, this 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
- **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).

We intend to roll out the Risk Tool in the next reporting period.

Supplier Code of Conduct

The Maddocks Supplier Code of Conduct (**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, **fourteen (14)** suppliers received and agreed to comply with our Supplier Code. This number is a drop on the last reporting period (FY21/22 was 24) as our previous reporting period included the distribution of the Supplier Code to our existing suppliers.

The Supplier Code continues to be a crucial step in the firm's ethical procurement processes. It is a key way for the Firm to raise 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.

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 lists 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-one (21)** new contracts (or contract renewals) that included appropriate modern slavery clauses according to the level of risk occurring in the performance of the contracts. 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.

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
- in this reporting period, we created a Risk Tool (see [page 10 Risk Assessment Tool](#)) which will be vital in assisting the procurement team in vetting and monitoring potential suppliers. We will implement and educate our staff, in particular our procurement team, on how to use the Risk Tool in the next reporting period
- to monitor existing suppliers, Maddocks conducts site visits from time to time, including to overseas sites. During this reporting period, no site visits were conducted due to ongoing COVID restrictions, however planning commenced for staff members to visit our outsource service provider, located in South Africa, in the next reporting period.

Policies

Ethical procurement is a well-established principle in our procurement processes. Maddocks has a Procurement Policy, Code of Ethical Conduct and Environmental Policy. These 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 our previous reporting periods to include specific sections on modern slavery and the addition of our Supplier Code.

Training and education of staff

During the reporting period, we have:

- **Launched a new mandatory online training module** for modern slavery as part of the new starter induction training. 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 **112** new starters, including legal staff, shared services and consultants, complete the new modern slavery training module since its launch in January 2023. Along with this new training module, new starters must also review and acknowledge the firm's Anti-Modern Slavery Policy.
 - **Established and launched our new 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 our newly established Incident Response Framework. There are links to the firm's training modules on modern slavery as well as current articles, cases and frequently asked questions. Since the launch of the page on 23 June 2023 until the end of the reporting period 30 June 2023 (1 week period) we had **29 interactions** from staff.
 - **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; and
 - key modern slavery facts, the laws, disclosure scores, trends to be aware of and how we are helping our clients in this space; and
 - the launch of our new intranet page and where to find relevant up-to-date modern slavery resources.
 - **Launched our new 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 five 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 in 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 establishment of a new Commonwealth Anti-Slavery Commissioner
 - the change in regulator of the Modern Slavery Act from the Australian Border Force to the Attorney General's Department
 - the new NSW Anti-Slavery Commissioner, Dr James Cockayne's Strategic Plan "Working together for real freedom"
 - 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. During this reporting period we also reviewed other professional services and law firms' Incident Response Frameworks and Risk Tools, to improve our understanding of, how to assess modern slavery risks as well as best practices on how to report and respond to any incidents of modern slavery within the firm or with a particular supplier. Conducting this research for both the Incident Response Framework and the Risk Assessment Tool assisted in the creation of two well-structured, easy to use resources that will provide practical guidance and risk mitigation tools for staff to follow.



Case Study

Modern Slavery Training Module

We continued our training and education on modern slavery throughout the firm during this reporting period by establishing and launching a brand new mandatory online training module for all new starters to the firm.

The modern slavery training module outlines useful resources that staff can access including pieces of relevant legislation, government guidance for reporting entities and links to anti-slavery entities in Australia who provide detailed information about modern slavery on their websites. It is an interactive training module requiring staff to complete 'learning check' questions at the end of each section, as well as including case studies to further develop their knowledge and understanding.

We have had 112 new starters from a range of business groups within the firm, complete the new modern slavery training module since its launch in January 2023. This includes legal staff, shared services staff and consultants. The feedback on the training module has been encouraging, with staff commenting on their improved understanding of modern slavery in the Australian context as well as from a global perspective. Some examples of feedback on our training module are set out on [page 17 Qualitative Assessment](#) of our Actions.




Case Study

Incident Response Framework

The purpose of establishing an Incident Response Framework was to implement 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 thoughtful responses to prevent reoccurrence.

Although there is no 'one size fits all' approach when responding to modern slavery incidents, we created a visual overview of the key factors for staff to take into consideration when dealing with a modern slavery incident:

-  Modern slavery incident reported
-  Preliminary assessment and safeguarding
-  Report to regulatory body (where applicable)
-  Remediation phase and actions
-  Communicate with stakeholders (as required)
-  Review phase – learnings

Not all of the factors above will be relevant to every incident, however they will assist as a practical foundation for staff to follow. The Incident Response Framework also contains an incident log template which will allow staff to be prompted by the categories and respond to relevant questions.

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 that we have the right tools in place in the unlikely event of an incident.

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.

Quantitative assessment of our actions

Modern Slavery KPI's

Key Objective	Key Performance Indicator	Summary of Performance
<p>Employee training and awareness</p> <p>Our newly designed 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.</p>	<p>The number of staff who have completed the online training module for regarding Modern Slavery.</p>	<ul style="list-style-type: none"> – All new starters are now required to complete a mandatory online Modern Slavery module designed to outline the Australian legislative requirements and context of modern slavery. – 112 of our new starters have now completed this mandatory online module since its implementation in January 2023. – 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. – Qualitative feedback has been obtained from employees in relation to the quality of the new training module (see Qualitative assessment of our actions).
<p>External Labour Hire Supplier Surveys</p> <p>The aim of the surveys is 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 with their employees to reduce the likelihood of modern slavery occurring within their organisations.</p>	<p>The number of labour hire suppliers who respond to our external Labour Hire Supplier Surveys</p>	<ul style="list-style-type: none"> – We provided five of our key labour hire suppliers with a detailed survey composed of seven categories to understand the way in which the labour hire company operates. – We received responses to four of the five (80%) Labour Hire Supplier Surveys which will be reviewed and analysed in the next reporting period.

Table continues on the following page

Modern Slavery KPI's

Key Objective	Key Performance Indicator	Summary of Performance
<p>Modern Slavery clauses in our supplier contracts</p> <p>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.</p>	The number of supplier contracts incorporating modern slavery clauses	<ul style="list-style-type: none"> – During this reporting period, Maddocks entered into 21 new contracts (or contract renewals) that included appropriate modern slavery clauses according to the level of risk occurring in the performance of the contracts.
<p>Acknowledgement and Compliance with our Supplier Code of Conduct</p> <p>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.</p>	The number of supplier contracts requiring compliance with our Supplier Code of Conduct.	<ul style="list-style-type: none"> – The firm has established an internal register listing the names of the suppliers who have received our Supplier Code. – During this reporting period, 14 suppliers have received and complied with our Supplier Code.
<p>Our new modern slavery intranet page</p> <p>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.</p>	The number of interactions on the intranet page.	<ul style="list-style-type: none"> – Since the launch of the page on 23 June 2023 until the end of the reporting period 30 June 2023 (1 week period) we had 29 interactions from staff.
<p>Reporting procedures under our Supplier Code of Conduct</p> <p>Monitoring the number of modern slavery concerns raised under our reporting procedures outlined in our Supplier Code of Conduct.</p>	The number of concerns raised under our reporting procedures.	<ul style="list-style-type: none"> – There have been no issues or concerns raised by any of our Suppliers or third parties through our reporting procedures.
<p>Annual compliance plan</p> <p>To ensure we are tracking in a direction of continual improvement, we monitor our compliance against our annual compliance plan.</p>	The percentage of completion of our annual compliance plan.	<ul style="list-style-type: none"> – We successfully completed 100% of our planned key priorities 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 rolled out the new online modern slavery training module for all new starters to the firm. A useful indicator to the firm that the new training module for modern slavery has been effective, that it properly outlines the standard Maddocks expects of its employees, and has a lasting impact on those completing it is through the positive feedback received from the new starters.

Maddocks received the following feedback from several new employees about the new modern slavery online training module:

"Coming with a strong overseas working experience, this training made me realise different types of modern slavery that I have actually seen and did not know how to identify. I would have considered these cultural expectations or standards and not thought twice about the fact they are completely incorrect "

"Slavery is such a heavy word that there would be total lack of awareness that there are other forms of slavery beyond physical labour in third world countries and it can happen anywhere...There can almost be a reversed bias coming to a developed country like Australia, because you almost automatically assume that those sort of things don't happen here"



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

The impact of the COVID-19 pandemic, during the first half of this reporting period, on workers, government, civil society groups and organisations was significant. Maddocks understand that the COVID-19 pandemic has increased the risk of modern slavery around the world, not only by disrupting anti-slavery efforts but also by increasing the vulnerability of workers and creating new risks of slavery. As part of our ongoing supplier due diligence, we will continue to consider the ongoing impacts of COVID-19.

As government restrictions were in place for the first half of this reporting period, 'on the ground' activities that would help to identify modern slavery risks and incidents, such as supplier site visits were not possible. In the second half of this reporting period, as COVID-19 restrictions started to ease in Australia and globally, the firm made the decision to conduct a physical site visit to our third party outsource service provider located in South Africa. This site visit will 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. We plan to conduct this site visit during our next reporting period.

Even with COVID-19 restrictions easing, the additional procurement streams for COVID-19 related supplies were still required by the firm (for example sanitiser, face masks, Rapid Antigen Tests, cleaning services etc) as staff continued to return to our offices in larger numbers. In the last reporting period, we undertook a considerable amount of due diligence regarding these procurements streams to better understand the source of these products and services. We are satisfied to report that there have been no modern slavery risks identified. We will continue our due diligence, and monitor procurement of these products and services for as long as these COVID-19 safety measures are in place.

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 regarding modern slavery compliance and resources from previous reporting periods remain available on our website; and
- Sonia Sharma, a Partner from our anti-modern slavery compliance team spoke at the Committee for Economic Development (**CEDA**) of Australia's Supply Chain Conference and published an Article on the CEDA Website which covered the changing modern slavery landscape and what clients should be doing to assess their anti-modern slavery maturity.



Maddocks Partner, Sonia Sharma (centre) at CEDA's Supply Chain Conference

The Introduction of the NSW Regime

Maddocks also acknowledges 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 Strategic Plan and priorities.

We 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 appreciate that Maddocks is a 'supplier' to NSW Government agencies and local councils. We 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.

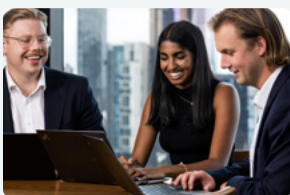


Continuing improvement: What's next?

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



Continued internal training: We will continue to roll out our mandatory online e-module training for all new starters. We will also aim to deliver training to the procurement team on the newly created Risk Tool and provide an update on Modern Slavery.



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.



Engaging with our labour hire suppliers: We intend to review and evaluate the responses we received to our Labour Hire Supplier Surveys in this reporting period. The aim will be to ensure that the labour hire suppliers operate with appropriate recruitment processes and employment conditions for their workers. Where responses suggest areas of concern, we will further engage with the labour hire 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.



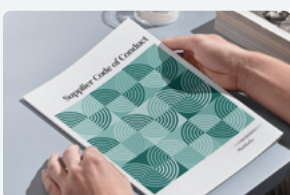
Developing a Tip Sheet for supplier site visit and audits in preparation of a site visit to a higher risk supplier in the next reporting period (see next item below). This Tip Sheet will be designed to assist our staff in spotting issues and concerns while conducting future site visits and supplier audits and not only with this higher risk supplier. The Tip Sheet will also be based on related guidance from the Commonwealth Guidance and the UN Guiding Principles on Business and Human Rights.



Conducting site visit of higher risk supplier: We plan to conduct a physical site visit to our third party outsource service provider, located in South Africa. This provider was flagged as a high priority by the firm, due to its susceptibility to modern slavery risks given its geographical location. The aim of the site inspection will be 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.



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.



Establish an external landing page (on the Maddocks website) to enable potential clients of the firm 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, and the firm's commitment to its reporting obligations under the Modern Slavery Act.



Implement our Risk Assessment Tool to assess our current and future suppliers in a formalised, cohesive way. The Risk Assessment Tool will assist Maddocks in identifying the level of due diligence required (questionnaires and education) depending on the goods and/or services provided the industry or sector the supplier operations in, and their geographical location.



Monitoring guidance issued by the Attorney General's Department: We are aware that the Attorney General's Department monitors the quality of statements and issuing supplementary good practice guidance on preparing modern slavery statements. We intend to review and consider any new supplementary guidance and continue to improve our approach in line with 'good practice' trends, where possible.



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 from the Global Slavery Index 2023 and independent third party reports on modern slavery reporting: we will consider the updated findings from the new Global Slavery Index and consider any implications on our modern slavery risks and actions. We will also 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 policies to include references and links to the Risk Assessment Tool and our Incident Response Framework.

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 15 December 2023.

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

15 December 2023
.....

Date

Type text here

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.	Page 2
b) Describe the reporting entity's structure, operations and supply chains.	Page 3
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.	Pages 4 – 5
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.	Pages 7 – 13
e) Describe how the reporting entity assesses the effectiveness of these actions.	Pages 15 – 17
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).	Page 18
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Pages 19 – 20

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 19 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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