



Modern Slavery Statement

Combatting Modern Slavery

This Statement is submitted on behalf of Mills Oakley under section 13 of the *Modern Slavery Act 2018* (Cth) (**MSA**) to cover the reporting period of 1 July 2023 – 30 June 2024.

We note the *Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Act 2023* (Cth) received royal assent in this reporting period and as a result Australia's first Commonwealth Anti-Slavery Commissioner, Chris Evans, was appointed. We look forward to continuing the fight against Modern Slavery amongst peers and authorities.

Mills Oakley understands that Modern Slavery practices are violations of human rights and serious crimes. In 2023, the Walk Free Global Slavery Index provided an updated estimate of modern slavery victims worldwide - raising the global estimate from 40 million to 50 million.¹ We are aware that devastating armed conflicts in 2023-2024 have been a contributor to the increased vulnerability of workers around the world. It is clear that the scale of the challenge remains vast and that this issue requires the attention of the global community more urgently than ever.

With the largest portion of the world's forced labour victims and child labour victims being exploited in the Asia-Pacific region, and 86% of forced labour being imposed by the private sector,² Australian markets have a close proximity to Modern Slavery practices both geographically and within the many supply chains of big businesses.

We believe Australian businesses have an obligation to respect, protect and fulfil human rights and fundamental freedoms. This includes identifying, assessing and addressing the risks of Modern Slavery in an entity's operations and supply chains to ensure Australian goods and services are not tainted by Modern Slavery.

Mills Oakley has a proud tradition of assisting vulnerable members of the community to protect their rights. For many years, we partnered with Australia's leading humanitarian law firm to provide pro bono services to disadvantaged individuals. In January 2021, Mills Oakley launched a new charity dedicated to pro bono work - Everyday Justice. Everyday Justice provides free legal advice to people and organisations who cannot access means-tested Legal Aid Services or afford a private lawyer without incurring substantial financial hardship. Everyday Justice acts for free in public interest law matters involving issues such as social or public welfare, human rights, reconciliation, the natural environment and the protection of animals. Everyday Justice has provided free advice and assistance to survivors of modern slavery.

Mills Oakley has every desire to maintain responsible, transparent operations and supply chains and to ensure that we do not cause, contribute to or become directly linked to any instances of Modern Slavery.

¹<https://www.walkfree.org/global-slavery-index/>

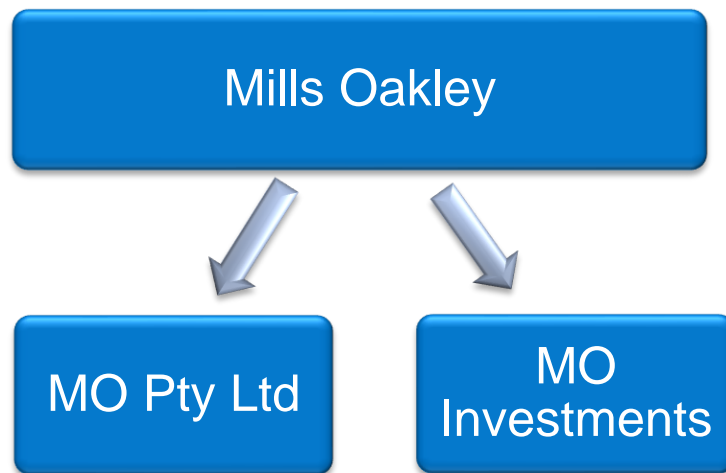
² Global Estimates of Modern Slavery, International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM) 2022: https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---ipec/documents/publication/wcms_854733.pdf; Hidden In Plain Sight report : https://parlinfo.aph.gov.au/parlInfo/download/committees/reportint/024102/toc_pdf/HiddeninPlainSight.pdf.fileType=application%2Fpdf

Mandatory Criteria 1 and 2 (MSA s16(1)(a-b)): Identification, structure, operations and supply chains

Mills Oakley (ABN 51 493 069 734) is a partnership, with our registered office at Level 6, 530 Collins Street Melbourne, Victoria. Mills Oakley is a full service, national commercial law firm providing legal services to our clients. We have been trading for 159 years and have an innovation and client focus. We have offices in Melbourne, Sydney, Brisbane, Canberra and Perth. We were resourced by over 938 partners and staff in our recent reporting period.

Mills Oakley also fully owns Mills Oakley Investments Pty Ltd (**MO Investments**) and Mills Oakley Pty Ltd (**MO Pty Ltd**) (together the **MO Entities**). MO Investments operations consist entirely of holding our investments. MO Pty Ltd manages the business affairs of the company but does not hold any assets. Neither of these entities employ staff.

Neither MO Investments nor MO Pty Ltd are reporting entities under the MSA, but both are entities that Mills Oakley owns or controls.



Everyday Justice is 100% owned by Mills Oakley and is not a reporting entity under the MSA. Everyday Justice has 4 lawyers who are permanently seconded into the service from Mills Oakley. Of those lawyers, 3 (at Lawyer level) are seconded 4 days a week and 1 lawyer (the Principal Solicitor) is seconded 3 days a week. These lawyers are employed by Mills Oakley. Everyday Justice also hosts university students as part of their clinical placement programs, offering hands on experience to law students interested in pursuing careers in the social justice sector. Everyday Justice engages approximately 8 volunteer law students at a time who work 1 day per week for a 12 week period during university semester. None of the Everyday Justice staff work on an arrangement where their visa ties them to the business.

Approximately 85% of Mills Oakley's workforce are permanent employees or partners, 10% are casual workers, and 5% are on temporary contracts (for example fixed-term contracts, parental leave coverage, seasonal clerks etc). Of our entire workforce, only 7 staff members (or 0.75%) are from overseas, working in an arrangement where their visa ties them to the business. We noted the introduction of the Workplace Justice Visa in 2024 which provides increased rights for these staff members. We do not hold any original copies of our employees' identification documents. All workers recruited from overseas are

paid in accordance with Australian laws regarding awards and wages. Neither MO Investments nor MO Pty Ltd employ staff.

Tier 1 of our supply chain (being those suppliers we directly contract with), in the recent reporting period was made up of about 629 suppliers. These suppliers provide goods and services to Mills Oakley, the MO Entities and Everyday Justice. Mills Oakley acknowledges that our supply chain extends beyond those with which we have direct contractual relationships.

Our tier 1 suppliers include: accounting, consultant, and legal/bar services; marketing services and advertisements; architectural services; archiving and document management; asset security and security services; art; books; building management services; cab, carpark, and transport services; catering and events services; food and drink; cleaning and maintenance services; conveyancing and property services; courier and postage services; IT software, hardware and services; dry cleaning; electricity and water; employee assistance programs; fire, first aid and safety; florist; flu vaccinations; insurance; office supplies and stationary; fit outs and furniture; construction related goods and services; pest control services; printing supplies and services; recruitment agencies; various subscriptions; training services; transcription services and venue hire.

Of our 629 tier 1 suppliers, 93.2% are based in Australia. This is an increase compared with prior reporting periods. The overseas suppliers are based in the USA, UK, New Zealand, Canada, Sweden, Switzerland, Hong Kong, India, Mexico, Brazil, the Netherlands, the United Arab Emirates, South Korea and the Netherlands. For our major suppliers we have a scheduled service delivery meeting, ordinarily conducted annually.

Last reporting period we included suppliers that Mills Oakley procures goods or services from on behalf of our clients (**Client Related Procurement**) in our tier 1 supplier analysis. We contract with these suppliers simply as an agent for our clients, so our relationship is less direct, but we believe it is important to consider what role we can play in these unique arrangements also. In this reporting period we improved our data extraction and analysis processes and so have been able to separate Client Related Procurement from procurement that contributes directly to our operations for increased accuracy. In future reporting periods we will continue to progress our analysis of Client Related Procurement but have focussed on improving processes around our direct tier 1 procurement for now. The vast majority of Client Related Procurement relates to medical services and legal services (such as barristers or services such as provision of client medical records, medico-legal examinations, expert evidence etc).

MO Investments holds only a small number of investments in Australian start-up companies. Everyday Justice has 4 suppliers unique to its own operations including 2 suppliers of software, 1 website support supplier and 1 insurer. All are based in Australia or New Zealand.

Mandatory Criteria 3 (MSA s16(1)(c)): Risks of Modern Slavery

Mills Oakley is aware that because of the prevalence of Modern Slavery, in particular in the Asia-Pacific region, every entity has risks of Modern Slavery in its operations and supply chains. We note that risk indicators in this space are constantly changing, and we are aware of the impact of recent armed conflicts around the world which contribute to new dynamics and hotspots.

Mills Oakley acknowledges that continually taking steps to understand where the risks of Modern Slavery are in our operations and supply chains, and how these risks change each reporting period, is a crucial step towards taking effective and accurate action in response to those risks. We have carefully considered the United Nation's Guiding Principles on Business and Human Rights to gain a deeper appreciation of how an entity like ours can cause, contribute to, or become directly linked to Modern Slavery.

Our operations primarily involve the provision of legal services, and we consider them to be lower risk. Lawyers are subject to stringent rules around ethics and conduct and our industry is closely regulated. Furthermore, many of our permanent employees who are under the Legal Services Award are required to record their time and this data is reconciled annually to ensure we are paying at or above the award based on actual hours worked. We would immediately backpay any individual who recorded more hours than the award rate allows for. We consider that this lowers the risk of Modern Slavery practices within our operations. We understand that casual, contractor and seasonal employees are more vulnerable to exploitation. Fortunately, only a very small portion of our workforce is made up of these kinds of employees. We have only 7 premises on which our employees work (including a new office in Darwin) and all employees are contracted to work regular business hours. This allows greater visibility over our workforce and the safety of our employees. As our new office in Darwin is established and grows, we will take care to make sure the same standards are implemented there as within our other offices across the nation, noting we continue to do so for our Adelaide office which was established in the prior reporting period. We are aware that there have been various investigations into the legal profession regarding the working hours of employees and that, while not an example of modern slavery, the existence of significant overtime work can indicate a culture that is more fertile for worker exploitation. We have detailed below the action we have taken in response to these risks.

Given our structure as a national partnership, we operate in a decentralised procurement model which means that processes, relationships and timeframes involved in procurements can vary. We understand this dispersal of oversight may increase the risk of Modern Slavery. However, while oversight is decentralised, we do conduct scheduled service delivery meetings with our contracted suppliers and carefully monitor performance and any issues arising from these relationships. Most of our contracts are longer-term stable contracts and due to the lengths of the contracts and the nature of our operations we don't often place particularly short delivery timeframes on our suppliers.

As above, tier 1 of the MO Entities' supply chain is made up of about 629 suppliers. This figure has decreased since our last reporting period, as we have improved our data review processes which enables us to separate out Client Related Procurement and more readily extract suppliers that we no longer work with. We note also that the contents of our tier 1 supply chain are not overly diverse. Many of our tier 1 suppliers provide the exact same types of goods and services to Mills Oakley being solely those items necessary for the provision of professional services. Though we understand the risk with each supplier is unique, we believe having a smaller range of goods and services is helpful in increasing our visibility over potential risks to an extent.

We have identified the following suppliers as posing a higher risk of Modern Slavery, due to the particular category of goods or services that they supply: catering; cleaning and maintenance services; dry-cleaning services; information and technology software, hardware and services; office supplies and stationery; fit outs and furniture; security services and recruitment agencies. We are endeavouring to investigate these new suppliers in future reporting periods.

Of our 629 tier 1 suppliers, they are located as follows:³

- **93.2%** in Australia
- **3.2%** in low prevalence countries: New Zealand, Canada, the United Kingdom, Sweden, Switzerland, the Netherlands
- **2.2%** in medium prevalence countries: Hong Kong, the United States of America and South Korea
- **1.1%** in high prevalence countries: India, Mexico, Vietnam, United Arab Emirates and Brazil
- **0.3%** in global or international suppliers

³ Utilising the Global Slavery Index 2023 prevalence rates (victims per thousand people) with low prevalence being countries with less than 2 victims; medium prevalence being countries between 2 and 3.5 victims; high prevalence being countries with over 3.5 victims.

Based on the 2 criteria of geographic location and type of goods/services a risk rating has been assigned to each supplier. Of greatest focus is our 6 high risk suppliers, being those flagged under both criteria. We have also identified medium risk suppliers as those flagged under just one of the criteria and a third risk category for suppliers for which more information is required. We do note that the vast majority of overseas suppliers are law firms that we contract with on behalf of our clients for the purpose of trademark registration often on behalf of clients. We take care to only contract with reputable recognised firms in this regard.

Mills Oakley acknowledges that our supply chain extends beyond those with which we have direct contractual relationships. From this exercise we further understand how our risk assessment changes as we peer deeper into our supply chains. We promise to continue to further understand the subsequent layers of our supply chains in future reporting periods.

Mills Oakley is not aware of any actual incidents of Modern Slavery cases that it has caused, contributed to or been directly linked to. We are aware that fully understanding our position in this regard is a complex and challenging exercise and we endeavour to continue to search for more risks and information to further assure ourselves of this position. We are very aware that absence of evidence is not always evidence of absence.

Mills Oakley acknowledges the ongoing impact that the COVID-19 Pandemic has had on Modern Slavery risks. We have continued to consider how the COVID-19 Pandemic may have increased the vulnerability of workers in our operations and supply chains. We acknowledge the reduced oversight we have regarding our workers health and safety in a post-pandemic world where flexible working arrangements are increasingly common. We have been careful to implement various processes to ensure we maintain strong connections and communications with our staff who when they work from home. We know that flow on effects from the sudden, unprecedented changes that occurred over the last few years have placed great pressure on a number of businesses and that any such pressures may continue to expose vulnerable workers to exploitation.

Mandatory Criteria 4 (MSA s16(1)(d)): Actions to assess and address risks

Mills Oakley is making a concerted effort to identify, prevent, mitigate and account for how it addresses Modern Slavery risks. Our desire is to take meaningful action in this space and, as such, we remain committed to our continuous improvement approach looking to build upon the action taken in our prior reporting periods and will ensure that the quantity of action taken does not become priority over the quality of action at any point in time. This approach is consistent with the United Nation's Guiding Principles on Business and Human Rights.

Our operations

Lawyers are subject to stringent rules around ethics and conduct, and furthermore our profession is closely regulated. We also comply with all Australian workplace laws including the *Fair Work Act 2009* (Cth), with the guidance of our workplace relations, employment and safety specialists and experts. All of our employees are provided with employment contracts detailing the conditions of their employment and their various rights and obligations.

We have a specialised Modern Slavery team at Mills Oakley who provide expert advice and assistance to many reporting entities in this space, conduct seminars and presentations around Australia and overseas, and work closely with not-for-profit organisations, civil society and many Australian businesses to improve the education, awareness and quality of response in this space. This team has grown in size over the last reporting period and continues to carefully oversee our own operations, undertake the identification of risks in our business and constantly build upon our approach to effectively assess and address same.

Amongst other practice areas, Mills Oakley provides expert advice in the areas of workplace relations, employment and workplace safety and are acutely aware of the laws, regulations and best practices in this area. We apply the same expertise that our clients receive to our own operations and in dealings with our own employees. We consider the application of this knowledge to our own operations to further decrease the risks of Modern Slavery occurring within same.

Policies and procedures

We believe that staff play a key role in our due diligence. Mills Oakley has a specific Modern Slavery Policy (the Policy) which is applicable to all staff and outlines the Mills Oakley's commitment to detect, assess, address and report on the risks of Modern Slavery or human trafficking within Mills Oakley's operations and supply chains. This Policy was reviewed within the last reporting period. This Policy details to staff the various pieces of legislation and guiding material that Mills Oakley expects all staff to comply with, including:

- *Fair Work Act 2009* (Cth);
- *Modern Slavery Act 2018* (Cth);
- *Modern Slavery Act 2018* (NSW);
- *Australian Criminal Code Act 1995* (Cth), specifically, Division 270 or 271 of the Criminal Code, extending to conduct in and outside of Australia;
- Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework;
- Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children; and
- ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

We are in the process of rolling out an updated Policy which encompasses the *Modern Slavery Amendment Act 2021* (NSW) as well as the *Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Act 2024* (Cth). The Policy educates our staff on the definition of Modern Slavery and highlights areas within our operations and supply chains that may be higher risk. The Policy details to staff what our risk assessment and due diligence processes are in this area.

Finally, from a remedial perspective we advise staff that any staff member who breaches the Policy by engaging in or conspiring to engage in any Modern Slavery conduct may face disciplinary action, that Mills Oakley may terminate relationships with individuals or organisations on a breach and that referral action to proper authorities will be taken in cases involving breaches of the criminal law.

Our Policy was rolled out in our second reporting period to all staff via an email which provided a copy of the Policy and our first Modern Slavery Statement. The Policy is available to staff at all times on our specialised Modern Slavery intranet webpage. All staff were required to read and refresh their knowledge of the Policy in our recent reporting period and we are pleased to say that 919 of 938 staff completed this training.

Mills Oakley understands that Modern Slavery includes only the most severe forms of exploitation. However, we also know that the existence of substandard workplace conditions can be a precursor of Modern Slavery. We have in place the following policies that we believe ensure our operations are aligned with our legal and ethical workplace requirements: Anti Bribery & Corruption Policy, Code of Conduct, Conflict Management Policy, COVID-19 Response Plan, COVID-19 Safe Working Environment, Diversity Policy, Drug, Alcohol and Smoking Policy, Fatigue Policy, Flexible Working Policy, Grievance Resolution Policy, Leave Policy, Equitable Briefing Policy, Time in Lieu Policy, Gender Equality Strategy, Pro Bono Policy, Mobile Device and Remote Working Policy, Privacy Policy, Parental

Leave Policy, Recruitment Referral Policy, Risk Management Policy, Violence Leave Policy, Whistleblower Policy, Workplace Behaviour Policy and Workplace Health & Safety Policy.

[Our Modern Slavery webpage](#)

Our Modern Slavery intranet webpage was launched in our third reporting period and includes copies of our most recent Modern Slavery Statement, our Policy and our Supplier Code of Conduct for staff to access at any time. It has an easy-to-use FAQ section to assist and educate our staff in this area. We inform our staff of the MSA, our training, reporting avenues, and the various steps we are taking in this area. We provide staff with the contact details of our internal Modern Slavery experts for further queries. The page has been updated in various ways in the recent reporting period. We continue to monitor and track how many views the webpage has had in order to aid in us reviewing staff awareness levels, our approach to risks and the effectiveness of same.

We have also furthered discussions around creating an external Modern Slavery webpage and are liaising with our Marketing team with a hope to progressing this in our next reporting period.

[Training](#)

In the recent reporting period, our internal Modern Slavery experts again ran interactive workshops in the Modern Slavery space, with attendance mandatory for all staff. These were a follow on from the interactive workshops conducted in 2022. There were 2 x 1 hour-long workshops conducted in person and virtually for staff all around the country. Our experts shared real stories of survivors and details of legal cases they have been engaged to act on involving Modern Slavery. This training continued the educational experience of our staff in a more meaningful way than online e-learning can and also refreshed staff knowledge on what Modern Slavery is, the prevalence and nature of Modern Slavery (including the updated data), explained what our legal obligations are as well as what further actions need to be taken by each staff member to ensure those obligations are met. We also updated staff on various changes in the law and around the world that had occurred in the recent reporting period and how those aspects impact Modern Slavery. Staff had at least an hour each session with our experts and were encouraged to guess statistics and ask questions resulting in a collaborative and effective improvement upon our training in this space. We carefully tracked which staff members attended these workshops live (as opposed to watching recordings at a later date) and were pleased that 673 staff did so.

To continue to bolster staff awareness alongside the interactive workshops, we required all staff to complete annual online training on Modern Slavery including mandatory reading of our Modern Slavery policy, our Modern Slavery Statement, our initial correspondence with our suppliers and our Supplier Code of Conduct. We previously worked with an external training provider to create this specific online training module on Modern Slavery, and the content was prepared with our internal Modern Slavery experts. The online course helps staff understand what Modern Slavery is, the impacts of Modern Slavery in present day society, what it means to have transparency in our supply chain, the MSA, and our reporting obligations. In our recent reporting period, 919 of 938 staff completed this training. The small percentage of staff that had not completed the course by 30 June 2024 were likely new starters who were given a longer period within which to complete the training. This high completion rate was achieved by concerted efforts by our Human Resources and Learning and Development teams to ensure all staff understood the importance of completing this training and also the increased awareness achieved through the interactive workshops.

[Annual Awareness Week](#)

In 2023, we held an annual awareness week for Modern Slavery centred around 2 December which is the International Day for the Abolition of Slavery. All staff received a daily email during this week which included an interesting fact or statistic, links to further resources, questions to prompt staff to consider their own interactions in this space and of course a link to our intranet page and the contact details of our internal experts. Topics covered included: holiday spending (toys, seafood, Christmas decorations), whether renewables are also ethical (with a spotlight on cobalt and polysilicon); the prevalence of slavery

in Asia/Pacific region; and modern slavery awareness generally. Given December is a particularly busy period for many in our profession, we have decided to hold this awareness week at an alternative time in our next reporting period for increased engagement.

Reporting

Mills Oakley acknowledges that the nature of Modern Slavery means that many victims and surrounding individuals are unable to draw attention to their circumstances for fear of negative consequences. Through the work that Everyday Justice does, we have assisted survivors of Modern Slavery in understanding and assisting in enforcing their legal rights.

Mills Oakley has a detailed Whistleblower Policy which clearly sets out the circumstances around protected disclosures and encourages the reporting of matters that may cause harm to individuals. This policy ensures the protection of the identity of a whistleblower and protects whistleblowers against detrimental conduct. This allows individuals the freedom to raise reports of Modern Slavery without fear of retribution in circumstances that meet the terms of the Policy. Having retribution-free reporting avenues is a key element of accurate due diligence in this area and will ensure we have greater visibility over our risks.

Supply chain mapping

Mills Oakley understands that supply chain mapping involves examining *risks to people* and is a key part of due diligence in this area. We set aside our own legal, reputational and commercial risks to enable us to focus primarily on risks to people as per the United Nation's Guiding Principles on Business and Human Rights.

Prior Reporting Period 2022-2023

In our prior reporting period, we undertook investigations into some suppliers that we identified as higher risk in the year before. One of the suppliers turned out to be a library subscription service, and we closely examined their documents including their supplier code of conduct and code of business ethics. This supplier made various responsible sourcing commitments and as such following investigations we lowered the risk rating of this supplier. Another 2 of the suppliers in our higher risk list we no longer procured from due to the contracts lapsing and services no longer being required.

We also examined our major coffee supplier, noting that coffee has a long history of links to modern slavery practices. We were pleased to find that our coffee supplier is already taking meaningful steps in this space, being a member of Sedex as well as the Specialty Coffee Association, a trade association with the purpose of making coffee a more sustainable, equitable and thriving activity from the farmers to the baristas. Our supplier through its bean supplier prepares an annual impact report engaging personally with the farmers they source beans from including farmers Maria from Colombia, Syeh from Indonesia, Gabriel from Uganda, Luiz Alberto from Brazil and Amesh from India.

Recent Reporting Period 2023-2024

In our recent reporting period, we again investigated a list of 5 higher risk suppliers from the prior reporting period. Of those suppliers, 3 we no longer procure from due to the contracts lapsing and services no longer being required. The remaining suppliers included a library subscription and an IT supplier for a cloud subscription service. Our IT suppliers all underwent rigorous processes in the recent reporting period as Mills Oakley achieved ISO27001:2022 Certification. We will endeavour to make further enquiries into the library subscription service in future reporting periods.

Separately, we commenced enquiries into a Federal Court case against one of the large banking institutions we work with. We discovered that AUSTRAC has been working with that bank since the case to help them improve processes and frameworks and they note the bank has been cooperative. We are considering whether we need to seek any further information to understand how this bank has progressed with these improvements.

In regard to new procurement, we investigated a potential relationship with a supplier in the Philippines. Our relationship managers worked together with our Modern Slavery experts over several months to conduct due diligence on this potential supplier. We sent our Supplier Code of Conduct out, clearly specifying our expectations in this space. Our detailed Modern Slavery Questionnaire was also sent to the supplier and the responses received highlighted some risk areas. These risk areas were discussed in detail with the supplier over several calls and discussions. We built into the resulting contract several Modern Slavery requirements including that the supplier improve and implement policies and processes and providing clear deadlines for this action. We shared several of our very own policies and processes with this supplier, to assist them in this task. We are pleased at this outcome and feel it is an excellent example of taking our suppliers on the journey with us, leading to better results for everyone.

In a collaborative effort across many areas of Mills Oakley, we continue to update the list of the MO Entities' tier 1 suppliers, and have reviewed the list to create a breakdown of each supplier based on the geographic location of a supplier, as well as the category of goods or services relevant to a supplier. We are conscious that our tier 1 suppliers are just one part of the picture of our supply chain, and as detailed above have sought to improve the process of data extraction over these suppliers as a step towards being able to review and analyse data from further tiers in future reporting periods.

There is no automatic correlation or causal link between an entity's spend and the actual risk of Modern Slavery occurring in a particular supplier's operations and supply chains. As such, we have not included spend as a factor in our analysis, opting instead to undertake mapping with known risk indicators in this area.

Utilising resources such as the Hidden in Plain Sight Report, the Attorney-General Department's resources, the NSW Anti-Slavery Commissioner's resources and the 2023 Global Slavery Index amongst others, we have identified higher risk suppliers based on geographic location and category of goods or services. The suppliers identified as potentially posing a higher risk of Modern Slavery are detailed under Mandatory Criteria 3 above. We will investigate these suppliers in our next reporting period, in order to better understand the risks presented by same. Our Modern Slavery experts will workshop an approach to further investigate these risks.

Our focus in any Modern Slavery risk assessment is on the human rights impacts that might have the gravest impact, affect the greatest number of people, or a delayed response may affect remediability. At the moment, given we are only aware of risks rather than any actual incidents, we are unable to prioritise actual incidents. We have every intention of factoring in severity and irremediability into our due diligence once we have the requisite information to allow this to be done.

Mills Oakley also acknowledges that risks in this area are fluid and we have seen how they change over time as we obtain greater visibility over our supply chain, as our suppliers and supply chain changes, and as the world and the occurrence of Modern Slavery alters and shifts. We have every intention of keeping our approach adaptable and responsive to these changes.

Suppliers

In reporting period 1 Mills Oakley created a specific Supplier Code of Conduct (the Code) centred around Modern Slavery issues. In reporting period 2, we sent the Code to every one of our tier 1 suppliers. We recirculate this Code as needed to potential new suppliers.

The Code applies to all of our direct suppliers and assists greatly both in due diligence around our suppliers and in our remedial powers in the event that actual instances of Modern Slavery are ever discovered. The Code also provides that we expect our suppliers to have their own suppliers adopt the commitments in the Code.

The Code clearly articulates the standards of practice we expect of our suppliers and details our commitment to combatting Modern Slavery. Mills Oakley wants to partner with suppliers who are willing to join us in strengthening our response to Modern Slavery, who are committed to high standards of transparency and ethical conduct, and who support other suppliers in promoting corporate social and environmental responsibility.

The Code requires compliance with the following:

- *Fair Work Act 2009* (Cth);
- *Modern Slavery Act 2018* (Cth);
- *Modern Slavery Act 2018* (NSW);
- *Australian Criminal Code Act 1995* (Cth), specifically, Division 270 or 271 of the Criminal Code, extending to conduct in and outside of Australia;
- Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ Framework;
- Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children; and
- ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

We are in the process of updating the code to encompass the *Modern Slavery Amendment Act 2021* (NSW) as well as the *Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Act 2024* (Cth). We require our suppliers not to do or omit to do anything that will cause us to breach any of the above laws and instruments. The Code educates suppliers on the definition of Modern Slavery, as well as detailing several relevant human rights and human rights related instruments and requires that suppliers uphold and comply with same. The Code details our expectations of suppliers when conducting their own risk assessments and due diligence processes. Under the Code, Mills Oakley has the right to audit our suppliers in a number of in-depth ways, and the Code requires our suppliers’ full cooperation with any such processes or requests. We also require our suppliers not to take any adverse action against staff or third parties because of their disclosure of information under the Code. Suppliers are informed that referral action to proper authorities will be taken in cases involving breaches of the criminal law.

Our contracts with suppliers contain clauses on compliance with local laws. We have drafted precedent contract clauses that speak more specifically to Modern Slavery to add contractual weight to our supplier code of conduct. As discussed above, we utilised these clauses just recently in a new engagement. Given the decentralised nature of our procurement processes, we are still in the process of updating these precedent contracts from an efficiency perspective as a result of different information gathered to date. We will continue to negotiate with various suppliers for the inclusion of same in our agreements in reporting periods ahead. We currently monitor the performance of our suppliers carefully and ordinarily engage in annual review sessions with suppliers to examine any issues with the relationship and dealings.

In reporting period 2, our Modern Slavery experts reviewed a copy of our current contracts with recruitment agencies that we work with. In reporting period 3, our Modern Slavery experts updated our Recruitment Consultant Engagement Terms to ensure sufficient transparency and protection for our prospective employees from any Modern Slavery related conduct.

We have also drafted a detailed supplier questionnaire aimed specifically at assisting Mills Oakley in identifying and assessing the risks of Modern Slavery within our supply chain. The questionnaire is currently over 40 questions long and is reserved for particularly high risks identified as it is quite robust.

COVID-19

Mills Oakley has taken great care to continue to monitor the health and wellbeing of our staff in the post-pandemic setting. We continue to provide frequent communications with staff regarding support services available including our free employee assistance provider lines. We have also asked staff to participate in a number of anonymous surveys to effectively identify any issues that need to be addressed.

Mills Oakley was able to function productively throughout the COVID-19 Pandemic and did not need to alter our agreements and arrangements with suppliers in any great way that would place new or unprecedented pressures on our supply chain.

Mandatory Criteria 5 (MSA s16(1)(e)): Assessing the effectiveness of our actions

Mills Oakley knows that risks in this area are fluid and can change over time as we obtain greater visibility over our supply chain, as our suppliers and supply chain changes, and as the world and the occurrence of Modern Slavery alters and shifts. Furthermore, we need to be sure that the steps we are taking in this area are actually creating positive change.

Our annual review of our Modern Slavery policy was conducted in the recent reporting period. Our webpage is a central point of information for all staff and contains contact numbers for those within the business who have the relevant expertise to answer questions on Modern Slavery. We are keeping track of any staff queries received to understand whether there are any areas for improvement in our staff education. As above, we also track viewing statistics regarding our website.

We are especially pleased to announce that we achieved very high rate of completion for staff reading our Modern Slavery Policy and Statement and for the more fulsome modern slavery course. The small percentage of staff that had not completed the course by 30 June 2024 were likely new starters who were given a longer period within which to complete the training. This high completion rate achieved by concerted efforts by our Human Resources and Learning and Development teams to ensure all staff understood the importance of completing this training, and also the increased awareness achieved through the interactive workshops we held.

Our live interactive workshops enabled our experts to engage directly with staff on Modern Slavery issues and gain a deeper understanding of the levels of staff awareness in this space.

We have reviewed our supplier list each reporting period to update and amend the information contained within same so that our risk assessments remain accurate. This enables us to learn a lot about the way our risks and supply chain changes annually as well as what we can do to increase our oversight. We are reviewing the responses to the Code that we have received from our suppliers so that we may utilise that information in future risk assessments.

Mandatory Criteria 6 (MSA s16(1)(f)): Consultation

As above, this Statement is provided on behalf of Mills Oakley, which owns the MO Entities. The MO Entities share the same Board, executive teams, and employees. The MO Entities adopt the same policies and processes and, as above, share the same supply chain. The Everyday Justice Board consists of 2 Mills Oakley partners and the Executive Director of The College of Law's Centre for Legal Innovation. Consultation therefore happens naturally through the 2 Mills Oakley partners, and in particular one of those partners is our internal expert on Modern Slavery.

This Statement was created through collaboration with the following key areas of our business: Human Resources, Information and Technology, Finance and Modern Slavery specialists. Consultation occurred with various senior personnel in those departments.

From our governing body

Mills Oakley makes this Statement in accordance with section 13 of the *Modern Slavery Act 2018* (Cth). Mills Oakley considers that its governing Board is its principal governing body for the purpose of the *Modern Slavery Act 2018* (Cth). This Modern Slavery Statement was considered and approved by the governing Board of Mills Oakley on 20 December 2024.



John Nerurker
Responsible Member of Mills Oakley's Principal Governing Body