
JOHNSON
WINTER
SLATTERY



Modern Slavery Statement

December 2022

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This statement is made and published on behalf of Johnson Winter Slattery (ABN 70 843 523 318) in compliance with the Modern Slavery Act 2018 (Cth) (Modern Slavery Act).

Johnson Winter Slattery became a reporting entity for the first time under the Modern Slavery Act in respect to the reporting period FY2021 – 2022 (first reporting period).

Johnson Winter Slattery is a partnership operating in Australia with its registered address at Level 8, 211 Victoria Square Adelaide SA 5000. Johnson Winter Slattery has an associated services entity providing administrative and support services to the partnership: JWS Services Pty Ltd in its capacity as trustee of the JWS Services Trust (services entity).

Johnson Winter Slattery and the services entity are under common control.

References to “Johnson Winter Slattery”, “we”, “us”, “our” or the “firm” are to Johnson Winter Slattery (ABN 70 843 523 318).

About Us

Johnson Winter Slattery is a leading independent full service commercial law firm with specialist expertise in all facets of commercial activity, covering the spectrum of transactional needs, advisory and compliance as well as dispute resolution.

We are engaged by publicly listed corporations, major privately held businesses, investment funds, not for profits, industry bodies, government agencies and regulators as legal counsel on important transactions and disputes throughout Australia and in respect to Australian law on transactions and disputes outside of Australia.

We help our clients navigate legal complexity in both commercial transactions and dispute resolution by applying specialist legal expertise, innovative technology and commercial awareness to our clients' business objectives. Commitments to outstanding client service, a collaborative ethos and the importance of fashioning commercial outcomes are hallmarks of our firm.

We also act as Australian counsel to foreign businesses and law firms, we appreciate the particular needs of those investing in Australia and their advisors. We assist clients and their primary counsel in navigating Australian regulatory requirements concerning inbound and outbound capital flows.

We currently have 81 partners, supported by more than 300 lawyers, business development, finance, HR and IT professionals from our offices located in Melbourne, Sydney, Brisbane, Adelaide, Canberra and Perth.



Our Approach to Modern Slavery

Our firm is committed to conducting its business in an ethical way that avoids causing or contributing to adverse human rights impacts, exploitation and any kind of discriminatory conduct.

We seek advice from the firm's modern slavery experts to actively identify modern slavery risks in our own operations and in the operations of our suppliers. The firm's modern slavery experts also assist clients on a variety of modern slavery issues including advising on how to identify, prevent and mitigate adverse human rights impacts in their businesses and supply chains.

Our policies and procedures along with our collaboration with suppliers and clients seeks to prevent or mitigate adverse human rights impacts in Australia and overseas we take a collaborative approach to influence change in our supply chains and with our business partners.

POLICIES AND PROCEDURES

We have a zero tolerance approach to modern slavery, discriminatory conduct or practices which are adverse to human rights, this approach underpins the policies we have, including:

The Workplace Behaviour Policy: A policy confirming the commitment of the firm to provide a safe and respectful work environment for all our people and sets out the expectations the firm has of each partner and employee.

The Equal Opportunity Policy: A policy providing the framework to ensure that our workplaces are free from discriminatory practices.

Diversity Statement and Strategy: A document which sets out the firm's strategy on diversity, which is a commitment by the firm to building and developing a talented and diverse workforce. Among other things the strategy confirms the firm's approach to equal remuneration for work of equal value achieved by application of a rigorous remuneration review process.

Anti - Bribery and Corruption Policy: This policy confirms the firm's no tolerance approach to any involvement, by our people, in bribery or corruption.

The Disciplinary Action Policy and Grievance Policy: These policies set out, among other things, the disciplinary action that will be taken if any person breaches any of the firm's policies and provides guidance for our people on how to report a grievance or difficulty.

OPERATIONS

Like other professional services firms operating in Australia we have deemed our operations vulnerability to modern slavery to be low, in coming to this conclusion we have considered the following:

- we are a law practice who provide professional services to our clients in a regulated industry where legal practitioners and law practices are required to conduct themselves in accordance with professional obligations and standards;
- we rely on a highly skilled professional workforce to provide professional services to our corporate clients, we do not rely on migrant skilled or unskilled workers or a transient/gig workforce;
- we regularly review our recruitment practices, we have a centralised recruitment function with direct and active oversight of recruitment at the executive level;
- we do not have operations outside of Australia and we note in this regard that Australia has been given the lowest vulnerability to modern slavery score in the Global Slavery Index.

First Reporting Period Action

During our first reporting period, we reviewed our policies to ensure they are aligned to the firm's commitment to minimising, identifying and remedying modern slavery risks in our operations.

We found that our policies are aligned to our firm's commitment in respect to modern slavery.

During this first reporting period we reviewed our recruitment practices to ensure among other things that we only use reputable recruitment firms and that our recruitment practices comply with all relevant laws and regulations.



SUPPLY CHAIN

Our supply chain consists of goods and services that support the provision of professional services to our clients. The services entity procures a lot of the goods and services on behalf of the firm.

We consider that it is our supply chain rather than our operations that may pose the greatest risk of incidences of modern slavery.

First Reporting Period Action

During this first reporting period we conducted a desktop review of our tier 1 suppliers to the services entity. We identified nearly 400 tier 1 suppliers to the services entity who are predominantly based in Australia however some of our tier 1 suppliers to the services entity source goods and services from outside Australia.

We have assessed the modern slavery risk of each of our suppliers against the following key factors:

- the sector/industry the supplier is in;
- the products and services being supplied; and
- geographic risks (per the Global Slavery Risk Index 2018)

During this first reporting period we identified the following key supplier categories as being of higher risk of incidence of Modern Slavery:

- Our offices - leased in 6 Australian states and territories: the firm's occupancy costs are significant, included in this cost is office cleaning. The low-skilled nature of this work could mean that workers are people more vulnerable to exploitation by employers and risky modern slavery practices can be hidden by multiple tiers of contracting;
- Technology including hardware: we rely heavily on technology to enable us to provide professional services to our clients. It is reported that the technology sector is at high risk of forced labour;
- Branded Merchandise: we procure the production of branded stationary and merchandise. Branded merchandise often originates from countries listed in the Global Slavery Risk Index 2018 as having high vulnerability to modern slavery; and
- Hospitality and catering: we host events and use hospitality and catering services. This industry can include workers that are more vulnerable to exploitation.

We have developed a relationship with a Human Rights Expert, with whom we will consult to ensure effective and swift action can be taken in the event we identify an incidence of Modern Slavery in our own operations or in the operations of our supply chain.

TRAINING AND EDUCATION

We have developed an online training module in respect to modern slavery which is available to all our staff. The training has been developed and presented by modern slavery experts within our firm.

THE FUTURE

We are committed to continuous improvement of our Modern Slavery practices and in the next reporting period we aim to:

- prepare and publish a responsible procurement policy and train our people responsible for procurement in line with that policy;
- interrogate our tier 1 suppliers – as to their approach to identify, address and remediate instances of modern slavery and abuses of human rights in their supply chains;
- update our modern slavery training and give mandatory modern slavery training to our procurement and Human Resources teams.

CONSULTATION AND APPROVAL

This Modern Slavery Statement was prepared by Johnson Winter Slattery's General Counsel in consultation with the Managing Partner, the People & Development Director, the National Payroll & Facilities Manager and other relevant support functions.

This Modern Slavery Statement has been approved by Johnson Winter Slattery's Management Committee.

Signed by



JEREMY DAVIS

Managing Partner
Johnson Winter Slattery



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