



Modern Slavery Statement

FOR THE PERIOD 1 JULY 2019 TO 30 JUNE 2020

This statement is made and published jointly on behalf of Allens, an Australian partnership, and Allens Operations Pty Limited as trustee for the Allens Operations Trust. References to ‘we’, ‘our’ and the ‘firm’ cover both entities.

This statement is made under section 14 of the *Modern Slavery Act 2018 (Cth)* (the **Act**) with respect to the financial year ending 30 June 2020.

OUR COMMITMENT

We are committed to taking action to assess and address modern slavery risks in our operations and supply chain, and in our inaugural modern slavery statement we describe the steps we have taken during the reporting period. We aim to build on this foundational work and continually improve our approach, and we have provided an overview of future actions we plan to take.

Allens aims to uphold the highest standards of quality and integrity. We support and respect the protection of internationally proclaimed human rights and we are committed to providing a fair and safe workplace, where our employees are treated with dignity and respect.

Allens was a foundation signatory to the United Nations Global Compact in 2001, and continues to promote and uphold the Compact’s 10 principles including those relating to human rights and labour standards.

OUR STRUCTURE AND OPERATIONS

Allens is a leading international law firm providing legal services to clients in the public, private and not-for-profit sectors across a wide range of legal practice areas including:

- Corporate
- Projects & Development
- Disputes & Investigations
- Banking & Finance
- Tax
- Competition, Consumer & Regulatory
- Intellectual Property & Patent & Trade Mark Attorneys

The firm has offices in Australia (Brisbane, Melbourne, Perth and Sydney), Vietnam (Ho Chi Minh City and Hanoi) and Papua New Guinea (Port Moresby) and a total headcount of approximately 1500 people, including partners, lawyers, practice support and corporate services staff.

Allens operates as a partnership in Australia. Allens is a local partnership in Papua New Guinea and the offices in Vietnam are locally licensed. Allens Operations Pty Limited is a separate service entity that provides support services to Allens' legal practice.

OUR SUPPLY CHAIN

We source products and services from a range of suppliers to support the provision of our legal services and the business operations of our firm.

Our main procurement categories are:

- information technology and technology services;
- business operations, including facilities management;
- marketing and hospitality services;
- human resources;
- knowledge services; and
- professional services.



ASSESSING MODERN SLAVERY RISKS

During the reporting period we conducted an initial scoping exercise to determine the nature and extent of modern slavery risks in our operations and supply chain. To prioritise areas of focus, where the risk of harm to people may be greatest, we conducted a risk-based assessment of our procurement spend and suppliers, taking into account factors such as types of products and services purchased, sector and industry and geographic location.

As a supplier of legal services, we operate in a sector and have a workforce composition that are considered to be at low risk of modern slavery practices. However, within our supply chain we have identified a number of procurement categories with higher exposure to modern slavery risks including:

- Information and communications technology (ICT) equipment;
- Facilities management (eg, cleaning and security services);
- Hospitality and catering services;
- Promotional items; and
- Outsourced business support services.

For some of these procurement categories, such as ICT equipment, we are aware that risks of modern slavery practices are highest in lower tiers of the supply chain over which we have more limited visibility and leverage.

The majority of our suppliers are located in Australia which has been assessed by the Global Slavery Index (**GSI**)¹ as having a lower prevalence of modern slavery practices. However, we have some direct and indirect suppliers based in countries (including Vietnam and Papua New Guinea) that have been ranked by the GSI as having higher risks of modern slavery practices.

For our first reporting period, we have focussed our attention on identifying and engaging with direct suppliers in procurement categories and locations with the greatest potential risks of modern slavery. In future reporting periods, we will work with our direct suppliers so that we are able to better understand, assess and respond to modern slavery risks at lower tiers within our supply chain. We will also continue to regularly review and refine our risk assessment approach to address any new and emerging modern slavery risks, and changes to our procurement spend and supplier base.

In the final quarter of the reporting period, the onset of the COVID-19 pandemic increased the vulnerability of workers in global supply chains to risks of modern slavery practices. Modern slavery risks and supply chain impacts were considered as part of the firm's broader response to the pandemic. We are aware that the pandemic has led to business disruption and economic pressure for some of our suppliers and altered consumption levels for certain products and services. We maintained open communication with suppliers and continued to pay for orders promptly. Where possible, we maintained supplier relationships and have continued to honour existing contracts.

¹ Global Slavery Index 2018 <https://www.globallslaveryindex.org/resources/downloads/>

ADDRESSING MODERN SLAVERY RISKS

During the reporting period we implemented the following actions to address potential risks of modern slavery that we have identified in our operations and supply chain:

- (a) Due diligence
 - (i) Conducted an initial scoping exercise and risk assessment process to identify the nature and extent of exposure to modern slavery risks in our operations and supply chain.
 - (ii) Reviewed and updated the firm's responsible sourcing processes and resources to incorporate modern slavery risk assessment and mitigation procedures.
 - (iii) Developed a Supplier Code of Conduct to clearly communicate the standards we expect of our suppliers, including with respect to human rights and labour practices. The Code of Conduct is available in English and Vietnamese.
 - (iv) Developed a responsible sourcing questionnaire, including questions relating to modern slavery risks, to supplement our supplier due diligence process.
 - (v) For suppliers in higher risk categories, we commenced a process of:
 - (A) conducting desktop screening checks in relation to modern slavery risks and practices; and
 - (B) requesting confirmation that suppliers understand and are able to meet the minimum standards in our Supplier Code of Conduct.
 - (vi) Commenced a review of our supplier agreements and procurement templates to incorporate appropriate requirements relating to the assessment and mitigation of modern slavery risks. This process is more challenging in circumstances where our leverage is limited, and where supplier standard terms and conditions are imposed.
- (b) Remediation process
 - (i) Commenced the development of a victim-centred remediation process, in consultation with our pro bono client, Australian Catholic Religious Against Trafficking in Humans (ACRATH), for use in circumstances where an instance of modern slavery is identified.
 - (ii) Extended the firm's grievance mechanisms to apply to concerns relating to modern slavery. Our policies and processes include a Whistleblower Policy and an independent and confidential 'Speak Up' service.

- (c) Training and awareness raising
 - (i) Organised responsible sourcing training and consultation sessions for staff with procurement responsibilities. The training included information about modern slavery, the firm's responsible sourcing processes and practices and the impact of the COVID-19 pandemic on modern slavery risks.
 - (ii) Created an online responsible sourcing portal for our staff including:
 - (A) information about modern slavery and modern slavery warning signs;
 - (B) tools and resources to assist with the assessment and mitigation of modern slavery risks, and
 - (C) details about the firm's grievance mechanisms for raising workplace and modern slavery concerns.
 - (iii) Incorporated information about modern slavery and the firm's responsible sourcing processes in the induction training program for new staff.
 - (iv) Invited external speakers from expert NGO organisations, including Walk Free and our pro bono client Fairtrade Australia and New Zealand, to present seminars for our staff on modern slavery and responsible purchasing practices.

EVALUATING EFFECTIVENESS OF OUR ACTIONS

To evaluate the effectiveness of our actions to assess and address risks of modern slavery, a number of quantitative measures have been implemented. During the reporting period we tracked the number of:

- (a) suppliers that were sent a copy of our Supplier Code of Conduct, and that confirmed they understood and met the minimum standards in our Code;
- (b) staff with procurement responsibilities that were consulted and completed training in our responsible sourcing processes; and
- (c) staff that attended an awareness raising event or presentation relating to modern slavery.

We also monitored the number and outcomes of desktop screening checks conducted.

Additional qualitative measures will be introduced in future reporting periods, including steps to review our responsible sourcing program and evaluate the effectiveness of our training.

FUTURE ACTION

We aim to continually strengthen and improve our approach to assessing and addressing modern slavery risks in our operations and supply chain and we have identified the following key areas of focus for future action:

- (a) Due diligence
 - (i) Continue to engage with direct suppliers in higher risk procurement categories to better understand processes that suppliers have in place to assess, address and remediate modern slavery risks within their supply chains.
 - (ii) Continue to integrate the assessment and mitigation of modern slavery risks into procurement templates and onboarding processes for new suppliers.
- (b) Remediation process
Continue to develop and formalise our remediation process, in consultation with expert NGO organisations where possible, to ensure we are able to appropriately and effectively respond to any suspected or actual instances of modern slavery that we become aware of in our operations or supply chain.
- (c) Training and awareness raising
Continue to deliver seminars and tailored training programs to staff across the firm with the aim of building awareness of modern slavery and the capacity to effectively apply our responsible sourcing processes.
- (d) Measuring effectiveness
Develop and improve the measures we use to evaluate the effectiveness of our actions, including formally establishing a cross-functional modern slavery working group to monitor and review the firm's modern slavery response.

ADDITIONAL INFORMATION

Through the firm's pro bono program we contribute to addressing some of the factors that exacerbate risks of modern slavery. Our lawyers provide free legal assistance to a large number of vulnerable individuals without adequate access to publicly funded access to justice, including asylum seekers and people experiencing homelessness. We work closely with a range of human rights organisations to provide this assistance, including the Human Rights Law Centre, ACRATH and refugee and immigration legal services.

GOVERNANCE AND CONSULTATION PROCESS

The Boards of Allens and Allens Operations Pty Limited are responsible for the oversight and approval of the firm's modern slavery statement. Day-to-day operation of the firm's responsible sourcing program, including our modern slavery response, is managed by the firm's Community Engagement Team and is overseen by the firm's Community Engagement Board (chaired by the firm's Managing Partner).

A wide range of stakeholders including members of the firm's Office of General Counsel, Finance, People & Development, Business Operations, Marketing, Integrated Legal Solutions and Information Technology teams, including relevant staff from the firm's Vietnam and Papua New Guinea offices, have been consulted in relation to the firm's modern slavery risk assessment and the development of our modern slavery response.

The Allens Board approved this statement on 3 March 2021 and the Board of Directors of Allens Operations Pty Limited approved this statement on 11 March 2021.

Signed By:



Fiona Crosbie
Chairman, Allens



Rod Fielding
Director, Allens Operations Pty Limited

Sydney

Level 4, 126 Phillip Street
Sydney NSW 2000, AUSTRALIA
Tel: +61 2 9230 4000