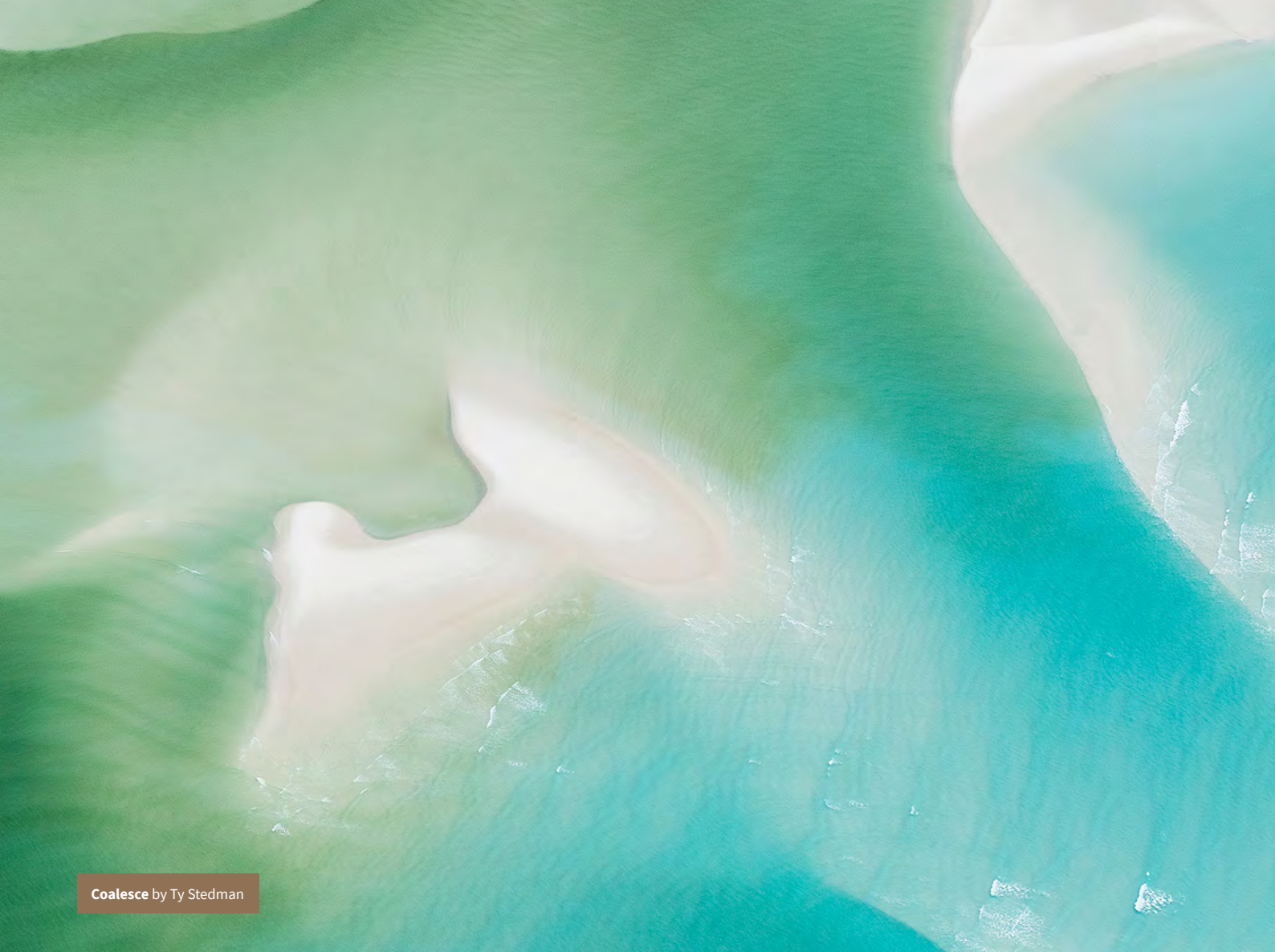




Coalesce by Ty Stedman

MODERN SLAVERY STATEMENT FY25

1 July 2024 - 30 June 2025

KING&WOOD
MALLESONS
金杜律师事务所

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ACKNOWLEDGEMENT OF COUNTRY

We acknowledge the traditional Owners of the land on which we work and live and pay our respects to Elders past and present. We recognise that this land always was and always will be Aboriginal and Torres Strait Island land.

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REPORTING ENTITIES AND STRUCTURE

INTRODUCTION

KWM Australia is committed to identifying, assessing, and addressing modern slavery risks in our supply chain and business operations.

This statement is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) (**Modern Slavery Act**) for the period 1 July 2024 to 30 June 2025 (**FY25 or Reporting Period**).

REPORTING ENTITIES AND STRUCTURE

This statement is made on behalf of KWM Australia, comprising:

- **King & Wood Mallesons**, a partnership in Australia: which provides legal services to our clients; and
- **Dabserv Pty Ltd¹**: which provides various support services (such as premises, finance, technology, procurement, travel, people & development and business development services) to the Australian partnership.

Each entity has its own employees and suppliers.

For convenience, a reference in this statement to KWM Australia refers collectively to both entities unless otherwise specified.

KWM Australia is part of King & Wood Mallesons, a global law firm headquartered in Asia, with offices in 26 locations around the world.

Globally, King & Wood Mallesons operates under a Swiss Verein structure (a legal entity formed under Swiss law) and is comprised of member firms across different regions, including independent partnerships in Australia, the People's Republic of China (**China Partnership**) and the Hong Kong Special Administrative Region of the People's Republic of China (**Hong Kong Partnership**).

Legal services are provided independently by each of the separate King & Wood Mallesons member firms. KWM Australia does not own or control the foreign business operations of these independent member firms of King & Wood Mallesons. See our website at [kwm.com](https://www.kwm.com) for more information on the King & Wood Mallesons global structure including KWM Australia's status within that global structure.

¹ Dabserv Pty Ltd (ACN 008 551 993), with its registered office located at Level 61 Governor Phillip Tower, 1 Farrer Place, Sydney, is trustee of the firm's service trust.

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OPERATIONS AND SUPPLY CHAIN

OUR OPERATIONS

KWM Australia is a full-service commercial law firm delivering a range of transactional and disputes-based legal services and capability. We have market leading legal expertise across a wide range of legal practice areas, including cross-border mergers and acquisitions; private equity; public M&A; employment; intellectual property; competition; international funds; commercial litigation; international arbitration; projects, energy and resources; real estate; construction; environment; tax; banking and finance; and restructuring and insolvency.

Our core business function involves the delivery of specialist professional legal services to our clients.

We advise and support our clients, both domestically and internationally on complex Australian law matters across a range of sectors.

In FY24, we launched Owl Advisory, a multi-disciplinary service, which helps clients establish compliance and governance systems, implement regulatory changes, navigate requirements of sustainability reporting, as well as general governance risk and issue management. KWM partners and lawyers who assist Owl Advisory do so as part of their role as KWM partners and lawyers. We also employ risk compliance advisors who work for Owl Advisory.

In addition to the provision of professional legal services, in Australia we offer clients resourcing support through a short-term contract engagement service known as KWMConnexion.

OUR WORKFORCE

KWM Australia employs approximately 1800 people in Australia (not including partners) and operates from 5 centres located in Brisbane, Canberra, Melbourne, Perth and Sydney.

In addition to our lawyers, we have a number of shared services and support functions that deliver critical business services, including Technology, Finance, Business Services, Business Development, Knowledge and People & Development.

Our workforce includes approximately 120 staff from outside Australia on working visas. We use labour hire agencies in Australia in limited circumstances to support casual personnel requirements within our legal, hospitality and other shared services teams.

WHERE WE OPERATE

While KWM Australia's operations are predominantly based in Australia, as a member of the King & Wood Mallesons global network, KWM Australia has relationships with other members of that network which have operations outside Australia, as part of a common global vision. The members of the network trade under a common name to provide seamless multi-jurisdictional legal services to the world's leading commercial entities.

KWM Australia has an affiliate entity, King & Wood Mallesons LLP (a Singapore limited liability partnership), which carries on a foreign law practice in Singapore (Singapore LLP). Under the arrangements with the Singapore LLP, the Singapore LLP provides legal and representation services to KWM Australia in the Southeast Asian region. KWM Australia also provides professional legal services and a range of support services to the Singapore LLP.

KWM Australia's relationship with the Hong Kong Partnership has also included the provision of some support services, the mutual exchange of professional legal services and the transfer of KWM Australia partners and employees to the Hong Kong office. KWM Australia does not own or control the Hong Kong Partnership or its operations.

KWM Australia's relationship with other parts of our global network includes:

- providing professional legal services to international clients
- providing professional legal services to, and receiving professional legal services from, other King & Wood Mallesons offices, including offices located in the Peoples Republic of China, and the United States of America
- the transfer of KWM Australia partners and employees to other King & Wood Mallesons offices and
- receiving services from other entities within the network.

While our relationship with members within the King & Wood Mallesons global network is very important to KWM Australia and our clients, we do not control the foreign business operations of these independent member firms of King & Wood Mallesons.

WHAT WE PROCURE

KWM Australia procures goods and services to enable our delivery of services to our clients. Goods and services are sourced from both Australia and overseas.

We have 7 major expense categories:



Human resources and staff costs



Premises and operations



Professional Services



Insurance



Information Technology (Software and Hardware)



Hospitality



Travel and accommodation

We purchased goods and services from approximately 2300 suppliers and contractors in FY25. This number does not include suppliers from whom we purchased goods and services through staff corporate credit cards. Our supply contracts constitute a mix of one-off, short-term and long-term contracts.

WHERE WE PROCURE FROM

Over 75% of our suppliers and contractors are based in Australia and comprise mostly of premises costs, professional services personnel (eg barristers, expert witnesses, technical specialists), sophisticated commercial suppliers and our KWM member firms. We take steps to identify and assess modern slavery risks associated with our suppliers irrespective of whether they are in Australia or overseas, as outlined in [Sections 3](#) and [4](#).

Our data shows that the bulk of the remaining suppliers or contractors for FY25 (excluding those engaged via credit card purchases) were based in Singapore, United States of America, United Kingdom, Hong Kong and New Zealand. The remaining 0.2% of suppliers were assessed to be in high risk jurisdictions and are detailed further in [Section 4](#).

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OUR MODERN SLAVERY RISK AREAS

Our Modern Slavery Working Group reviews potential modern slavery risks in our operations and supply chains on a regular basis. The 6 key risk areas identified in our last statement remain the same in this Reporting Period.

No additional areas of risk have been identified.

RISK AREAS WITHIN OUR OPERATIONS

- **Workforce and recruitment:** We recruit staff in accordance with applicable employment laws and obligations. We use labour hire agencies to provide staff in limited circumstances. Agency staff may be short-term contractors or require a visa to work in Australia. We recognise the reliance on external recruitment agencies means that we have less visibility or control over the recruitment practices and employment conditions adopted by those organisations. As a consequence, this outsourcing of recruitment creates an element of modern slavery risk. We have processes in place to minimise this risk, including requiring recruitment agencies to comply with our Supplier Code of Conduct, which sets out our expectations on human rights.
- **Domestic contractor and service arrangements:** We procure services for the maintenance of our premises such as cleaning services, indoor plant maintenance, document production, printing services and casual labour hire such as contracted hospitality staff. Some of these sectors tend to employ workers from more vulnerable populations (eg migrant workers, base and semi-skilled workers, limited English-speaking capability). We identify this as a potential modern slavery risk for our business. We have due diligence processes in place and remain vigilant to identifying this type of risk. As part of our efforts to address this risk area, we conducted a review of our premises' cleaning suppliers last year (see our [FY24 statement](#)) and assessed the overall risk of modern slavery to be low. In FY25, we conducted a check of the CAF² directory and found that 2 of our cleaning suppliers have now completed CAF pre-qualification status. We will undertake another review in FY26 to ensure the risk of modern slavery being present in our cleaning supply chain remains low.

² CAF refers to the Cleaning Accountability Framework and can be found at <https://www.cleaningaccountability.org.au/>

RISK AREAS WITHIN OUR SUPPLY CHAIN

- **Suppliers of suppliers:** our supply chain has multiple tiers, and we acknowledge that there are certain sectors and industries, products and services, geographic regions and supplier entities that carry a higher risk of modern slavery than others. While we can coordinate due diligence of our tier 1 suppliers and act where high-risk suppliers come to our attention, we have less immediate visibility or control of the business practices and operations of the suppliers of tier 2 suppliers and beyond. To mitigate this risk, we conduct due diligence for our tier 1 suppliers to ensure they have active modern slavery programs in place within their own businesses.
- **Offshore suppliers and contractors:** our offshore supply arrangements are varied and include legal services and software subscriptions. We also engage independent members of our King & Wood Mallesons global network (which are not controlled by KWM Australia) and other foreign law firms or professional services providers in countries where the perceived risk of modern slavery may be elevated (eg where a country has limited government response to modern slavery as identified in the Global Slavery Index 2023).
- **Procurement of goods for corporate functions on an ad hoc basis:** gifts or promotional goods are procured for corporate functions in a decentralised manner by individuals or teams within our business. Goods may be purchased in bulk (eg cups or notebooks) and due to the low cost involved, do not always undergo the same level of procurement due diligence as higher value contracts managed by our procurement team. While we still have procurement policies in place to govern purchases made by our staff, this risk can be elevated where the goods are purchased (directly) from overseas countries which have been identified as higher risk. We continue to place a strong focus on education and training of our staff about our procurement policies to mitigate this risk. We conducted a review of this risk area last year (see our [FY24 statement](#)). In FY25 we conducted targeted training for our Early Careers P&D Team and Events Team.

Following the training, our Procurement Team noted an uptick in the number of due diligence queries received from our Early Careers P&D Team and Events Team on potential vendors. This increase signals to us that we have strengthened our risk controls in this area.
- **Risk-based products identified for Australia:** The supply chain for electronic goods (laptops, computers and mobile phones) is generally considered a source of elevated modern slavery risk.³ As a firm that procures electronic goods for use by our people, we perform due diligence during the tender process for our tier 1 suppliers and their supply chains and final vendors are chosen in respect of criteria that includes the existence of robust modern slavery policies and procedures. However, we recognise the inherent risks that may be present beyond tier 1 and tier 2 suppliers.

³ Electronics were identified in the Global Slavery Index 2023 as one of Australia's top 5 categories of imported products at risk of modern slavery

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ASSESSING AND ADDRESSING MODERN SLAVERY RISK

ASSESSMENT OF MODERN SLAVERY RISK

We assessed the risk of modern slavery being present in our Australian business operations and supply chain for the Reporting Period to be low. This assessment was conducted by members of our internal Modern Slavery Working Group (which is made up of members from our Procurement, Strategy, Risk and Responsible Business teams).

We made this assessment by reviewing the 6 areas we identified as our key modern slavery risks within our operations and supply chain (see [Section 3](#) above) and actions taken to address these risks both this year and in previous reporting periods.

OPERATIONAL RISK IS LOW

For our operations, our identified risk areas are workforce and recruitment, contractors and service arrangements.

We consider the risk to be low in the recruitment space due to the processes we have in place that require recruitment agencies we contract with to meet the standards set out in our Supplier Code of Conduct (which requires suppliers to conduct their business in a fair and ethical manner free from corruption and exploitation). We also use large reputable recruitment agencies who do not outsource to third parties. These recruitment agencies are likely to have an elevated awareness of their obligations for combatting modern slavery due to the legal industry (as a whole) bringing attention to this area.

For contractors and service arrangements, a review of our cleaning suppliers (a high-risk industry) also led us to assess the risk as low (see case study in our [FY24 Statement](#)). From a further review of the CAF during the Reporting Period, we maintain the overall risk to be low.

In addition, the legal industry more broadly is considered low risk for modern slavery given the type of professional services that we provide. The Global Slavery Index 2023 also identifies Australia as low risk in terms of its estimation of the prevalence of modern slavery and vulnerability to modern slavery.

SUPPLY CHAIN RISK IS LOW

For our supply chain, our identified risk areas are tier 2 suppliers and beyond (including suppliers of technology products), offshore suppliers and procurement of ad hoc goods for functions and events.

We assess the overall risk in our supply chain to be low. In conducting a risk analysis, we reviewed our suppliers based on the country they are in, the category of goods and services offered, and the volume of our spend.

The analysis found:

- Over 75% of our tier 1 suppliers are in Australia and represent over 80% of our spend.
- For our Australian supply chain, the nature of goods and services procured are predominantly attributed to premises costs (leased office space), barristers, consultants, staff benefits, technology and agents.
- After Australia, the top 4 locations where our tier 1 suppliers are based are Singapore, the United States, Hong Kong and the United Kingdom, representing 11% of our suppliers and 16% of our spend. We assess the suppliers in these countries as low risk largely due to the nature of goods and services procured (eg legal or professional consultants, agents, seminar costs, lease of office space), which are low risk for modern slavery.

-
- We identified 1 supplier located in a very high risk⁴ country location (Philippines), however the nature of the supply was low risk, being a consultant. We assessed the overall supply as low risk as a result.
 - Sixteen suppliers were in high risk⁵ locations (Fiji, India, Vanuatu, Vietnam, China, Indonesia, Thailand and Sri Lanka). These attributed to 0.4% of our total expenditure and 0.7% of our total supplier list and the supply was for agents, consultants, seminars and software (all assessed as low risk supplies).
 - For our staff credit card purchases, 90% of the total expenditure could be traced to an Australian supplier. Just 6% of total expenditure could be traced to countries considered medium to high risk. The bulk of our staff credit card spend (78%) related to travel (taxi, flights, accommodation), entertainment, and food expenditure, each of which is captured by our formal staff expenditure policies relating to gifts, travel and hospitality. In relation to travel, the majority of our spend is with firm approved vendors who have existing agreements in place and/or relates to suppliers for which due diligence has been carried out on the risks of modern slavery. The remaining credit card spend relates to low risk supplies such as memberships, sponsorships, subscriptions, search and registration fees and court fees. We acknowledge that a small percentage of suppliers and spend categories for credit card purchases could not be identified to make a risk assessment. We are working on making year on year improvements to our processes to eliminate this gap.
 - Our ad hoc purchases for conferences and events could be traced to Australian suppliers and consisted mostly of food hampers, diaries and gift boxes. We do not consider these purchases to be at high risk of modern slavery. We also considered ancillary services offered as part of large corporate conferences to be captured by our formal procurement processes and therefore risk minimisation measures are in place.
 - Our vendor questionnaires continue to show that our vendors have a broad understanding of their obligations under the Act or how they can identify and minimise modern slavery risk. No additional risks have been identified through our vendor questionnaires, and we continue to review new suppliers added to our system with a threshold spend of more than \$50k. We are actively following up all outstanding responses to vendor questionnaires.

⁴ Initial risk rating is determined according to the inherent country risk rating on a third-party platform used to manage our modern slavery risk for suppliers

⁵ Initial risk rating is determined according to the inherent country risk rating on a third-party platform used to manage our modern slavery risk for suppliers

ACTIONS TAKEN TO ADDRESS OUR MODERN SLAVERY RISKS

We continued to implement our existing processes and controls to assess and address our modern slavery risks in the Reporting Period. Key actions taken in FY25 are set out below.

AREA OF FOCUS	ACTIONS COMPLETED
Supply chain and procurement	- Continued to issue our modern slavery questionnaire to new vendors (expenditure threshold of \$50k) - Members of our Procurement team attended meetings with industry groups, consultants and other independent procurement professionals to discuss approaches to manage modern slavery risk - Explored additional third-party provider software solutions to help us conduct due diligence and monitor risk aspects of vendors, including modern slavery risk
Education and awareness	- Review of our in-house firmwide modern slavery e-learning module by our legal team – to identify if improvements could be made - Attendance by members of our Modern Slavery Working Group at Responsible Business Forum on Drafting Modern Slavery Statements - Attendance by members of our Modern Slavery Working Group at AusLSA Roundtable seminars - Targeted training session presented to our Early Careers P&D Team and Events Team on modern slavery risks related to procurement of ad hoc event goods – leading to heightened awareness of the due diligence process before vendor engagement - Supplier engagement regarding modern slavery obligations – general education and awareness conversations
Partnerships and collaborations	- Continued collaboration with the Australian Legal Sector Alliance and other member law firms - Pro bono legal work specific to combatting modern slavery and broader human rights issues (see Section 7)
Due diligence processes	- Continued to enhance our existing due diligence on suppliers invited to tenders handled by our Procurement function including review of questions asked on tenders - Continued to perform due diligence both before and during the vendor onboarding process, through a sub-set of modern slavery questions (for vendors not engaged through formal tender) - Ongoing work to prepare policies and procedures on third party risk, with work on the training of our people on how to manage this risk to be rolled into FY26

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ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

THE EFFECTIVENESS OF OUR ACTIONS IN FY25

We measure the effectiveness of our actions by tracking our progress against key performance indicators.

FOCUS AREA	INDICATOR	RESULT
Education and awareness	Year on year increase in number of people completing our firmwide online modern slavery module Increased engagement of our people with our Procurement Team on selecting suitable vendors and conducting due diligence	We had an uplift in the number of people completing our online training module (444 in FY25 vs 312 in FY24) Our Procurement Team experienced an uptick in the number of due diligence queries from internal teams on suitable vendors (for purchases made outside of the formal procurement process)
Risk assessment	Complete a modern-slavery focused review of at least 1 identified risk area – for FY25 we identified e-waste management as a risk area for review	We did not undertake a review of our e-waste management in FY25 and will endeavour to complete this in FY26
Supplier engagement	Collect data via our modern slavery questionnaire from active overseas suppliers and suppliers in high-risk industries in Australia	Modern slavery vendor questionnaires were sent out to suppliers. No new risks were identified from completed questionnaires. We actively follow up the return of uncompleted questionnaires as a priority.
Remediation and grievance mechanisms	100% of incidents reported remediated or resolved Reporting mechanisms in place are accessible and effective	Zero modern slavery incidents reported through our incident response policy or anonymous reporting platform Reporting mechanisms have been tested and found to be robust, accessible and effective at enabling our people to report a modern slavery incident

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LOOKING FORWARD TO FY26

KWM Australia aims to continuously improve our approach to combatting modern slavery risks in our operations and supply chains.

OUR FOCUS FOR FY26

PROCUREMENT AND RISK ASSESSMENTS

- Finalise selection of a new procurement software platform, with a view to enhancing our ability to monitor and conduct due diligence on vendors
- Commence a deep dive into our supply chain (particularly tier 2 suppliers), spend categories and uplift processes (where possible) to improve our data set
- Continue to engage with external parties, to stay abreast of platform and system developments in monitoring and engagement options

PARTNERSHIPS AND COLLABORATION

- Explore and consider the opportunity to join the Australian Legal Sector Alliance's Modern Slavery Consortium, which is an industry collaboration for identifying and addressing modern slavery risks of common suppliers in legal services
- Continue to align with internal teams over the firm's Responsible Business Blueprint

EDUCATION AND TRAINING

- Train our people on how to manage third party risk relating to our modern slavery risk areas

PREMISES

- Undertake a review of modern slavery risks associated with the disposal of e-waste, which is known for its complex global supply chain and high risks of exploitation of vulnerable people, including children

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OTHER RELEVANT INFORMATION

We recognise that modern slavery is strongly linked to other human rights and societal issues such as gender and discrimination, poverty, education, climate change and environmental sustainability issues.

In FY24 we developed a comprehensive Responsible Business Blueprint, which sets out our best practice responsible business framework. The aim of the framework is to communicate to our people exactly what Responsible Business means to us at KWM, what we want to achieve and how we are going to achieve it. This framework has been endorsed by our Executive Team.

Our modern slavery response forms part of our Responsible Business Blueprint, with a clear goal to strive for responsible and sustainable procurement, underpinned by our broader objective to maximise good and minimise harm to people and planet.

In addition to modern slavery, our Responsible Business framework includes the following:

- Community Pillar (Pro Bono & Social Impact) - We provide pro bono legal services to hundreds of community organisations, UN agencies and some individuals on a wide range of topics, supporting their efforts to promote a fairer and more sustainable future. This includes advice on their modern slavery obligations.
- Community Pillar (Fairer Futures) – Our Fairer Futures initiative includes targeted programs that improve equity of access for young people from low socio-economic backgrounds and other disadvantaged groups. This includes programs and services that demystify legal rights and responsibilities for young people. For example, KWM TalkLaw® workshops in high schools unpack legal rights and responsibilities through practical learning experiences. Our CyberLaw® program, run in partnership with Youth Law Australia and a range of our commercial clients, provides free and confidential legal advice and assistance to young people and their advocates.
- Governance Pillar - A robust set of policies and risk management framework that discourage behaviour that may have a direct or indirect impact on modern slavery, such as our Modern Slavery Policy, Speaking Up Policy, Procurement Policy, Code of Conduct and Anti-Bribery and Corruption Policy
- Marketplace Pillar - Delivering seminars, tailored presentations and publishing publicly available resources on our website on the topic of modern slavery and associated risks, which help organisations understand their role and obligations and the services we can provide.

These measures demonstrate the effectiveness and importance of collaborating with communities and stakeholders to raise awareness of, and contribute to, combating modern slavery.

PRO BONO WORK SPECIFIC TO COMBATTING MODERN SLAVERY

KWM has continued to provide pro bono advice to The Smith Family on their modern slavery reporting and training materials through FY25.

KWM has also been providing pro bono legal support to Walk Free, an international human rights organisation that works to address the root causes of modern slavery and create systems level change. This has included research about the prevalence of modern slavery in countries around the world and assessment of government responses.

PRO BONO WORK ON BROADER HUMAN RIGHTS MATTERS

We partner with a range of specialist and generalist community legal centres across Australia to provide pro bono legal services through clinics, ensuring individuals in underserved communities at risk of exploitation have access to justice. Through these collaborations, we offer support and expertise to those who might otherwise be unable to afford legal representation and access the legal system.

Our clinic partners include Justice Connect Homeless Law, Refugee Legal and the Asylum Seeker Resource Centre (Melbourne), LawRight (Brisbane), Refugee Advice and Casework Service and Redfern Legal Centre (Sydney), Street Law Centre WA (Perth), Youth Law Centre (ACT), and Youth Law Australia's Cyberlaw Clinic.

We also provided pro bono support on the following:

- research and advice to the International Centre for Advocates Against Discrimination project on the right to live with dignity
- assisted Youth Law Australia to prepare for submission of Civil Society Report for the UN Committee on the Rights of the Child
- advised the Human Rights Law Centre and Justice and Equity Centre on human-rights related matters, as well as facilitating a part-time secondment of a KWM solicitor to Human Rights Law Centre.

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CONSULTATION AND BOARD APPROVAL

This Statement was prepared through consultation with a team of representatives from our Procurement, Risk, People & Development, Business Services, Strategy and Responsible Business functions, which consisted of staff from the reporting entities covered by this Statement. This Statement was also reviewed by the Office of General Counsel in our firm.

KWM Australia does not own or control any of the other entities within the global KWM network.

The King & Wood Mallesons Australia Board approved this statement on behalf of the Australian partnership on 26 November 2025.

The board of directors of Dabserv Pty Ltd approved this statement on 18 Decemeber 2026.

KING & WOOD
MALLESONS
金杜律师事务所



David Friedlander
Chairman
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DABSERV PTY LIMITED



Renae Lattey
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