



Modern Slavery Statement

FOR THE PERIOD 1 JULY 2022 TO 30 JUNE 2023

Allens acknowledges the Traditional Owners of Country throughout Australia, on whose lands we live and work. We pay our respects to Aboriginal and Torres Strait Islander peoples, their stories and their continuing cultures, and to Elders, past and present.

This is the fourth modern slavery statement¹ made and published jointly on behalf of the reporting entities, Allens (ABN 47 702 595 758), an Australian partnership, and Allens Operations Pty Limited (ABN 87 004 992 607) as trustee for the Allens Operations Trust.

References to ‘we’, ‘our’ and the ‘firm’ cover the reporting entities, any entities they own or control and any associated entities.

This statement is made in compliance with the *Modern Slavery Act 2018* (Cth) (the *Act*) with respect to the financial year ending 30 June 2023.

¹ For completeness, and to comply with the reporting requirements in the Act, where our structure, operations, supply chain and processes have remained the same during the reporting period, some information has been re-stated from previous statements.

1.1 OUR COMMITMENT

We are committed to taking action to assess and address modern slavery risks in our operations and supply chain. We seek to apply a consistent approach to the management of modern slavery risks across all of the firm’s offices and business operations. In this modern slavery statement we describe the steps we have taken during the reporting period, and actions we plan to take to continually improve our approach.

Allens was a foundation signatory to the United Nations Global Compact in 2001, and our continuing goal is to promote and uphold the Compact’s 10 principles including those relating to human rights and labour standards. We also seek to promote Sustainable Development Goal 8.7 in relation to the eradication of forced labour, modern slavery and human trafficking.

1.2 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 and Patent & Trade Mark Attorneys

The firm has offices in Australia (Brisbane, Melbourne, Perth and Sydney), Vietnam (Ho Chi Minh City and Hanoi), Singapore and Papua New Guinea (Port Moresby). Allens operates as a partnership in Australia. Allens is a local partnership in Papua New Guinea and the offices in Singapore and Vietnam are locally licensed. Allens Operations Pty Limited is a separate service entity that provides support services to Allens’ legal practice.

Allens has an international alliance with global law firm Linklaters LLP. The complementary practices of Allens and Linklaters LLP provide clients with access to a global network, while operating independently.

As at 30 June 2023, we had a total headcount of approximately 1790 people including partners, lawyers, practice support and corporate services staff. The majority of our people, approximately 96%, are based in our Australian offices and 4% are based in our Asia Pacific offices.

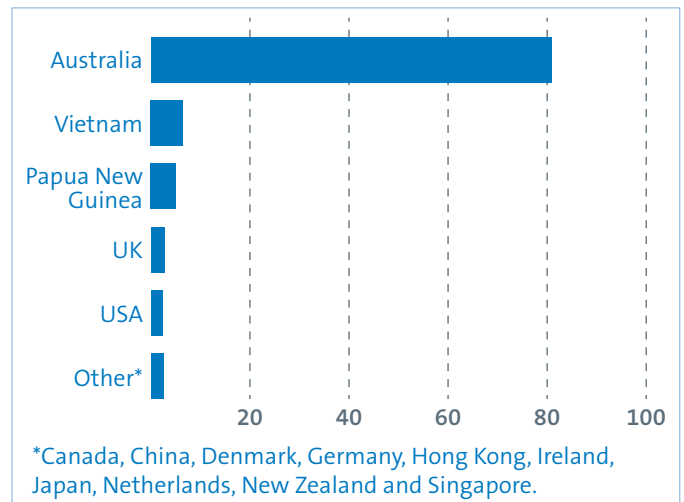
We engage some contract lawyers as part of Allens Adapt, our flexible resourcing program, as well as for the managed document review service we provide for clients. From time to time we engage other professional staff on a contract basis, or temporary agency staff to support short-term business needs including in connection with catering services and events.

1.3 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.

During the reporting period, the firm procured products and services from over 900 direct suppliers². The geographical distribution of these suppliers is indicated in Figure 1 below, with the majority (approximately 80%) based in Australia.

Figure 1: Allens’ FY2023 direct suppliers by country (base).



The firm’s main procurement categories (based on spend) in FY2023 were:

- business operations (including leasing and facilities management);
- information and communications technology and services;
- professional services (including insurance);
- business travel;
- human resources;
- marketing and events; and
- knowledge services.

As well as reviewing our accounts payable records, we have started to expand our review of direct suppliers to include firm-issued credit card transactions, focusing initially on the top 50 suppliers by spend³. The direct suppliers included within this initial review are primarily in the business travel and entertainment sectors and located in low risk countries, with the majority (approximately 95%) located in Australia.

We acknowledge that our supply chain extends beyond our direct suppliers, and we have commenced mapping indirect suppliers in procurement categories at higher inherent risk of modern slavery practices, including promotional items and cleaning and waste services.

2 This supplier analysis includes suppliers recorded in our accounts payable system, but does not include legal services suppliers (eg, barristers, law firm agents and expert witnesses) engaged on behalf of, or for the purpose of providing advice or services to or for the benefit of third parties ('legal services suppliers'), and credit card spend.

3 Our review of firm-issued credit card transactions excludes legal services suppliers.

1.4 IDENTIFYING MODERN SLAVERY RISKS

As previously disclosed, we apply a risk-based methodology to assess and prioritise modern slavery risks in our operations and supply chain. Our approach is informed by reputable tools including the Global Slavery Index (GSI)⁴ and takes into account modern slavery risk factors associated with geographic locations, industries, types of products and services, and business models. In assessing geographic risk, our methodology takes into account the location of direct suppliers and (where known) the location of product manufacture or service delivery.

We also monitor emerging risks on an ongoing basis through sources such as media monitoring, industry experts and NGO reports. During the reporting period, we refreshed our risk assessment methodology by reference to updated data and guidance in the GSI and the Global Estimates of Modern Slavery: Forced Labour and Child Labour (GEMS)⁵.

To inform our evaluation of modern slavery risks, we also consider the concept of continuum of involvement as set out in the United Nations Guiding Principles on Business and Human Rights and the ways through which we have potential to cause, contribute or be directly linked to modern slavery.

(a) Operations

We have considered the potential for modern slavery, such as the use of forced labour, to exist in our operations, and we have again assessed the overall risk as low. As a supplier of legal services, we operate in a highly regulated sector and have a workforce composition that is considered to be at lower inherent risk of modern slavery practices. Although our total headcount increased slightly during the reporting period, we continued to have over 95% of our people located in Australia, which has been assessed by the GSI as having a lower prevalence of modern slavery practices. We take action to comply with all applicable employment legislation, and have written terms of employment for all employees. We also take action to comply with minimum wage requirements and conduct checks to confirm all employees are being paid above minimum wage, including those covered by the Legal Services Award 2020.

(b) Supply chain

We review our risk-based analysis of procurement spend on an annual basis, taking into account potential modern slavery risk factors. For this reporting period, there have been no changes to procurement categories previously identified as having higher inherent risk of potential modern slavery practices.

- **Information and communications technology (ICT) equipment.** There are risks of potential modern slavery practices in connection with the extraction of raw materials, and the manufacture of ICT equipment in higher-risk geographies.
- **Promotional items and uniforms.** There are risks of potential modern slavery practices in connection with the sourcing of raw materials, and the production and manufacture of these products. Risk factors include low cost business models, vulnerable workers and complex supply chains that extend into countries with higher risks of modern slavery practices.
- **Facilities management (eg, cleaning, security, waste management and recycling services).** Modern slavery risks may be elevated if vulnerable workers are present, and subcontracting practices are in use. Transparency may be more limited when these services are indirectly provided through third parties including building managers.
- **Hospitality, food and catering services.** There have been reports of vulnerable worker exploitation in the food, agriculture and hospitality sectors in Australia⁶, and forced and child labour in connection with imported food products such as fish and cocoa⁷.
- **Outsourced business support, labour hire and recruitment services.** Potential risks may be heightened in this procurement category in circumstances where there is reduced visibility and control over recruitment practices, and workers' employment terms and conditions.

Although the majority of our direct suppliers are located in Australia, we recognise that potential risks of modern slavery practices may be elevated for direct and indirect suppliers located in countries (including Vietnam and Papua New Guinea) that have been ranked by the GSI as having a higher prevalence of modern slavery. We also acknowledge that our direct suppliers may be part of complex supply chains and that potential risks may be heightened in lower tiers of our supply chains where we may have less visibility and leverage.

4 Walk Free Foundation (2023), The Global Slavery Index 2023, <https://www.walkfree.org/global-slavery-index/>

5 ILO, IOM & Walk Free Foundation (2022), Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, <https://www.walkfree.org/reports/global-estimates-of-modern-slavery-2022/>

6 Human Rights Law Centre et al (2022), Paper Promises? Evaluating the early impact of Australia's Modern Slavery Act, <https://www.hrlc.org.au/reports/2022/2/3/paper-promises-evaluating-the-early-impact-of-australias-modern-slavery-act>

7 Walk Free Foundation (2023), The Global Slavery Index 2023, <https://www.walkfree.org/global-slavery-index/>

1.5 ASSESSING AND ADDRESSING MODERN SLAVERY RISKS

(a) Policy framework

As previously disclosed, the firm has a policy framework to support our provision of a fair, safe and inclusive workplace, to guard against practices that may be present in situations of modern slavery, and to guide our approach to assessing and addressing modern slavery risks in our operations and supply chain.

We also have a responsible sourcing program designed to promote procurement practices that are ethical, and environmentally and socially responsible. During the reporting period we reviewed and strengthened our responsible sourcing policy and process by providing more detailed guidance in relation to procurement steps and practices, and products and services with higher inherent risks of modern slavery and environmental impacts.

The following are the primary policies and procedures that support the firm’s approach to assessing and addressing modern slavery risks in our operations and supply chain.

Policy/process	Purpose
Responsible sourcing policy and process	Sets out our processes for taking environmental and social considerations (including modern slavery risks) into account in our procurement decisions.
Supplier Code of Conduct	Applies to our suppliers and sets out the minimum standards we expect in relation to ethical business practices, human rights and labour practices, and environmental management.
Resolving issues policy	Sets out ways to raise a concern, and our commitment to resolving issues in a supportive and constructive way.
Whistleblowing policy	Sets out how to raise concerns about suspected serious misconduct without fear of reprisals or victimisation.

As detailed in our FY2022 Modern Slavery Statement, we also have a number of additional policies that indirectly support our approach, including our Ethics code, Anti-corruption policy, Inclusion and diversity policy, Respect and fairness policy, Third party engagement policy and Workplace health and safety policy. These policies cover obligations, commitments and expectations relating to workplace behaviours and practices, and procedures for entering into third party arrangements.

All of the above policies and procedures apply to partners, employees and contractors in all of our offices, other than the Supplier Code of Conduct which applies to our suppliers.

(b) Due diligence

Our approach to supplier due diligence is risk-based. For direct suppliers identified as having potentially higher inherent risks of modern slavery, our due diligence processes may include desktop screening checks of publicly available information, database searches, ongoing media monitoring and seeking written confirmation that suppliers understand and are able to meet the standards in our Supplier Code of Conduct.

We have started to expand our due diligence beyond tier one suppliers and during the reporting period we began mapping and conducting due diligence enquiries in connection with indirect suppliers in procurement categories at higher inherent risk of modern slavery practices, including cleaning and waste services and promotional items.

To support our supplier due diligence process we commenced working with Informed365, a third party supplier due diligence and risk assessment platform. As a tenant and office-based business, we share overlapping procurement categories with the property sector, and have joined the Property Modern Slavery Supplier Platform hosted by Informed365. The platform manages the distribution of self-assessment questionnaires, and evaluation of supplier responses. Suppliers are able to share their responses with all clients on the same platform, resulting in efficiency gains and reduced burden on suppliers. During the reporting period, we began using the platform to connect with suppliers in our higher risk procurement categories.

Additional actions during the reporting period included:

- (i) developing responsible sourcing specifications (including in relation to modern slavery) to include in procurement tender documentation;
- (ii) through the firm’s third party contract review process, continuing to integrate modern slavery clauses, where possible, into relevant supplier terms of agreement; and
- (iii) maintaining our registration as a Fairtrade supporting workplace, by sourcing Fairtrade certified tea, coffee, sugar and cocoa for use in our staff kitchens.

(c) Training and awareness raising

We have continued to provide education sessions, a responsible sourcing and modern slavery e-learning module, and a dedicated responsible sourcing intranet site for employees to build knowledge and awareness of modern slavery risks, and capacity to apply the firm’s responsible sourcing processes.

Our responsible sourcing and modern slavery e-learning module has been incorporated into the standard induction program for people joining the firm. The module includes an explanation of modern slavery, details of the prevalence, risk factors and indicators of modern slavery, and the types of products and services at higher inherent risk of modern slavery practices. During the reporting period, the module was reviewed and updated to include recent data and findings from the GSI and GESM, a step by step guide to applying the firm’s responsible sourcing process and additional assessment questions to test understanding and learning outcomes.

Members of the firm's Business Operations team attended an external presentation relating to the assessment of modern slavery risks in legal sector supply chains, and People and Development team members were provided with an overview of the firm's responsible sourcing process, including measures to assess and address potential risks of modern slavery. The responsible sourcing intranet site was also updated to include additional guidance material in connection with procurement categories at higher inherent risk of modern slavery, including promotional items and clothing.

During FY2023 approximately 420 employees attended training or an awareness raising event relating to modern slavery or responsible sourcing.

(d) Collaboration and external engagement

We recognise the importance of external engagement and participating in multi-stakeholder initiatives to share knowledge and refine best practice.

In connection with the statutory review of the *Modern Slavery Act 2018* (Cth), Allens participated in consultation sessions with lead reviewer Professor John McMillan AO, hosted by the United Nations Global Compact Network Australia (**UNGCNA**). Legal specialists in the firm's Business & Human Rights practice also contributed a detailed written submission to the review.

During the reporting period, members of the firm's Responsible Sourcing team and Business & Human Rights legal practice attended the 2023 Modern Slavery Conference hosted by the Commonwealth Attorney-General's Department, which was convened with the aim of bringing together diverse stakeholders and promoting cross-sector collaboration on modern slavery responses.

Through the firm's membership of the Australian Legal Sector Alliance (**AusLSA**), we joined the AusLSA Modern Slavery Co-Lab program, designed to support an effective modern slavery response in the Australian legal sector through collaboration, knowledge sharing and capacity building. We also continued to be an active member of the UNGCNA's Modern Slavery Community of Practice for business members.

(e) Remediation and mechanisms for raising concerns

We continued to provide a number of internal and external mechanisms for employees and contractors to raise concerns about unacceptable behaviour, including in relation to potential modern slavery risks. Mechanisms include an anonymous complaints portal and support options such as access to confidential counselling.

In the reporting period we:

- (i) completed a project to refresh employee awareness of, and improve channels and options for, resolution of issues and support, which included promoting our anonymous complaints portal on the firm's intranet and reminding people of options available to raise concerns as part of a firmwide training program; and
- (ii) refreshed our firmwide training on respect and fairness, which sets out our expectations of conduct for everyone in the firm.

As previously disclosed, our Supplier Code of Conduct requires suppliers to provide their workers with a mechanism to confidentially report grievances without fear of penalty, reprisal or harassment. The Code also includes a requirement for whistleblower protection and for reporting mechanisms to be accessible and well-publicised.

Australian Red Cross 'Modern Slavery happens in Australia' flyers and postcards (available in different languages) have also been made available in our service centre reception areas. The Australian Red Cross materials provide information about modern slavery, and who to contact for advice and support.

1.6 EVALUATING EFFECTIVENESS OF OUR ACTIONS

To evaluate the effectiveness of our actions to assess and address modern slavery risks, we continue to monitor quantitative measures including supplier due diligence assessment and modern slavery training completion rates. Through the firm's third party contract review process, we record the inclusion of modern slavery-related clauses and the firm's Supplier Code of Conduct in new and renewed supplier terms of agreement. We also monitor the frequency and trends of all concerns raised (including any modern slavery concerns if they were to be raised) through our anonymous complaints portal, and the time taken to resolve them.

To better assess the learning outcomes of our responsible sourcing and modern slavery training, we added more detailed assessment questions in our e-learning module, and we aim to continue enhancing our processes for seeking qualitative learner feedback.

During the reporting period, we also reviewed, updated and refined the supplier risk assessment methodology and templates for our responsible sourcing program.

The firm's Modern Slavery and Responsible Sourcing working group, comprising senior representatives from the firm's Business Operations, Office of General Counsel, Finance, Information Technology, Marketing & Client Services and People & Development teams has continued to meet with the objective of supporting operational implementation, monitoring progress and reviewing effectiveness of the firm's actions to assess and address modern slavery risks in our operations and supply chain.

During the reporting period, no instances of modern slavery were identified or reported through the firm's due diligence processes or grievance mechanisms.

1.7 FUTURE ACTION AND PROGRESS

We aim to continually strengthen and improve our approach to assessing and addressing modern slavery risks in our operations and supply chain. In the table below, we outline progress on the areas of focus identified in our FY2022 Modern Slavery Statement, and identify new areas of focus for future action.

Risk assessment and due diligence	Progress
	<ul style="list-style-type: none"> ■ Updated our supplier risk assessment methodology to reflect updated data and guidance in the GSI and GEMS reports. ■ Commenced using a supplier due diligence platform hosted by Informed365. ■ Reviewed and strengthened our Responsible sourcing policy and process.
	Areas of future focus
	<ul style="list-style-type: none"> ■ Continue to review our risk assessment approach from time to time to address any new and emerging modern slavery risks and priorities, and monitor changes to our procurement spend and supplier base. ■ Expand our use of the Informed365 supplier due diligence platform, to support ongoing assessment and engagement with direct and indirect suppliers. ■ Continue to review the firm's policy documents, including our Ethics Code, to reflect our commitment to assessing and addressing risks of modern slavery practices.
Training and awareness raising	Progress
	<ul style="list-style-type: none"> ■ Updated our responsible sourcing and modern slavery e-learning module and refreshed our firmwide training on respect and fairness.
	Area of future focus
	<ul style="list-style-type: none"> ■ Develop and launch tiered responsible sourcing training to support people with different levels of procurement responsibilities.
Evaluating effectiveness	Areas of future focus
	<ul style="list-style-type: none"> ■ Continue to develop and enhance measures of effectiveness, including in relation to training feedback and learning outcomes. ■ In our FY2024 employee survey, ask people about their trust in mechanisms for raising concerns, to ensure we are aware of the level of trust and any areas for improvements.

Collaboration and external engagement

Progress

- In connection with the Modern Slavery Act statutory review, participated in consultation opportunities and contributed a written submission, which was cited favourably in the final report to the review.
- Continued to participate in the UNGCNA Modern Slavery Community of Practice and joined the AusLSA Modern Slavery Co-Lab program for legal sector members.

Area of future focus

- Continue to participate in multi-stakeholder initiatives and support sector-led opportunities for collaboration and knowledge-sharing.

1.8 ADDITIONAL INFORMATION

Our pro bono legal practice enables us to provide free representation to organisations working to combat modern slavery and individuals vulnerable to exploitation.

During FY2023, we provided free legal assistance to Australian Catholic Religious Against Trafficking in Humans, an NGO that works to counter human trafficking and slavery in Australia. We also provided guidance on modern slavery to the Responsible Contracting Project at Rutgers Law School's Center for Corporate Law and Governance.

A focus area of our pro bono practice is support for asylum seekers, an extremely vulnerable population at risk of exploitation. During the reporting period, we assisted a number of Afghani and other clients to apply for asylum in Australia and for some unsuccessful applicants, to appeal against protection visa refusals. We also represented stateless clients in test case appeals against indefinite detention.

We also provide free legal assistance to build capacity in organisations that provide food aid to counter food insecurity and by so doing, help prevent vulnerability to exploitation. In Australia, we work with Oz Harvest and in Vietnam, with VietHarvest.

Allens has a full service ESG legal practice and our legal specialists produce publications, deliver presentations and advise clients in relation to the management of human rights risks in their operations and supply chains (including in connection with modern slavery).

1.9 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). The firm’s Modern Slavery and Responsible Sourcing working group supports operational implementation, monitors progress and reviews effectiveness of the firm’s responsible sourcing processes.

The firm has shared business functions and policies (including in relation to the management of modern slavery risks). A wide range of stakeholders from across the firm were consulted in connection with the preparation of this statement, including from the Office of General Counsel, Finance, People & Development, Business Operations, Information Technology, Marketing & Client Services, Innovation & Digital Solutions and Patent and Trade Mark Attorneys teams, and relevant staff for the Vietnam, Singapore and Papua New Guinea offices.

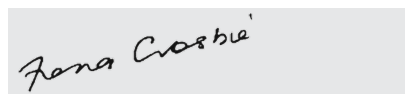
Members of the Board of each reporting entity were given an opportunity to consider and provide comments on the statement prior to approval and publication.

The Allens Board approved this statement on 24 November 2023 and the Board of Directors of Allens Operations Pty Limited approved this statement on 6 December 2023.

INDEX:

Mandatory criteria for modern slavery statements <i>Modern Slavery Act 2018 (Cth) s 16.</i>	Location of information
Identify the reporting entity.	Introduction
Describe the structure, operations and supply chains of the reporting entity.	1.2 Our structure and operations 1.3 Our supply chain
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	1.4 Identifying modern slavery risks
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	1.4 Identifying modern slavery risks 1.5 Assessing and addressing modern slavery risks
Describe how the reporting entity assesses the effectiveness of these actions.	1.6 Evaluating effectiveness of our actions
Describe the process of consultation with any entities that the reporting entity owns or controls.	1.9 Governance and consultation process
Provide any other relevant information.	1.1 Our commitment 1.7 Future action and progress 1.8 Additional information

Signed By:



Fiona Crosbie
Chair
Allens



Matt Graham
Director
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