

Modern Slavery Statement

Dated 17 March 2021 in respect of
the reporting period 1 July 2019 to
30 June 2020



Introduction

This Modern Slavery Statement is a joint statement made on behalf of Shine Justice Ltd and Shine Lawyers Pty Ltd (together, **Shine**) in accordance with the requirements of the *Modern Slavery Act 2018* (Cth). This statement relates to the reporting period from 1 July 2019 to 30 June 2020.

Shine acknowledges that it has an obligation to protect human rights, starting from the way it conducts its business now and into the future. Shine is committed to ensuring that there is transparency in its operations and approach to tackling modern slavery. Shine wishes to prevent modern slavery from ever taking place in its operations and supply chains.

Shine upholds the following values in its operations:

Always stand up for the little guy: We stand up for the underdog, giving a voice to those who would otherwise be unheard. We are tenacious and never, ever give up. We pride ourselves on never shying away from the tough cases.

Dare to be different: We are not your typical law firm, we challenge the 'norms' of the traditional law firm. We treat the impossible as an opportunity. We think beyond the legal industry.

Ahead of the pack: We challenge the status quo and always ask 'why?' We are not afraid to pioneer new ways. We always look to the future for tomorrow's opportunities.

Shine Justice Group – operations, structure and supply chains

Shine Justice Ltd is the holding company of businesses (**Shine Justice Group**) which provide legal and loss recovery services. The Shine Justice Group is committed to standing up for the rights of everyday Australians.

Shine Justice Ltd is an ASX listed company and is Australian owned. As at 30 June 2020, the Shine Justice Group had 54 branches in Australia and New Zealand and 903 team members.

The Shine Justice Group structure is set out in Annexure A.

The principal activities of the Shine Justice Group are the provision of legal services in Queensland, Victoria, Western Australia and New South Wales and the conduct of an insurance recovery business in New Zealand.

The Shine Justice Group specialises primarily in damages based plaintiff litigation legal services, primarily relating to personal injury, and also practices in other areas, including class actions, family law, medical law, dust diseases and abuse law.

As the Shine Justice Group deals in legal services, it has a relatively simple supply chain that is built to support the core legal practices and maintain technology, systems and infrastructure.

Shine's suppliers include suppliers of a variety of goods and services including office cleaning, facilities management, office equipment, office supplies, IT, communications, property, transport, marketing, medical services, recruitment services, auditors, banks, legal counsel and insurers.

Shine seeks to do business with suppliers that have similar values, ethics and sustainable business practices including in relation to human rights. Shine understands that the risks relating to suppliers will vary depending on their industry, geographic location and company size.

Risks of modern slavery practices in Shine's operations and supply chains

As the primary work of Shine involves the administration of legal services, Shine considers the risk of modern slavery within its direct business operations to be low. As the practice of law is regulated, our people are required to conduct themselves to specific standards applicable in the jurisdictions in which we operate. As a regulated legal practice, we consider the risk of modern slavery existing within our operations to be low.

However, Shine acknowledges that multi-tiered supply chains may mean it is directly or indirectly exposed to the risk of modern slavery.

Shine takes reasonable steps to ensure its suppliers are aware that they are expected to adhere to the standards expected by Shine, in accordance with our Supplier Code of Conduct.

Actions taken by Shine to assess and address modern slavery risks, including due diligence and remediation processes

In October 2019, the Board of Shine Justice Ltd adopted a Modern Slavery Policy which confirms a commitment to prevent, detect and report the risk of slavery or human trafficking within Shine's operations and supply chains and articulates the fundamental elements of Shine's approach to human rights. A Supplier Code of Conduct was also adopted to clearly articulate the standards of practice expected of our suppliers and to confirm our commitment to taking a proactive approach in ensuring our business standards effectively address the risks of modern slavery in our operations and supply chains.

The policy and code were distributed initially to a range of key suppliers, with acknowledgement required where warranted by the relevant level of risk.

As the awareness, responsibility and conduct of all Shine Justice Group members are instrumental in mitigating the risk of modern slavery within our business, specialised training was developed to raise awareness and understanding of the meaning and risk of modern slavery and was made available to all, and completed by the vast majority of, team members. Regular reminders are provided to ensure training is undertaken on a regular basis.

Shine has risk management processes to assist in identifying areas of concern so that mitigating action can be taken to lessen those risks. These include:

- a) inclusion of modern slavery clauses in material new procurement contracts;
- b) due diligence processes as appropriate when taking on new suppliers;
- c) provision of our Modern Slavery Policy and Supplier Code of Conduct to existing and new key suppliers; and
- d) our Whistleblower Policy, which enables all employees to comfortably and confidentially report any concerns they have relating to modern slavery in the Shine Justice Group's operations or within supply chains.

We have conducted an internal review of the top suppliers in our operations and supply chain with respect to modern slavery risks.

Having regard to the location and nature of our suppliers, we have assessed that while Shine operates in a low risk sector, the following areas of our supply chain are risk areas:

- Shine sources stationery and technological devices and hardware from suppliers that we anticipate may use offshore manufacturers. As we do not have visibility over these offshore manufacturers, there is a possibility that they may be located in countries with a high prevalence of modern slavery;
- Office cleaning services are used in each of Shine's locations. Shine has low visibility over the supply chains of these cleaning services where such services are provided through Shine's direct suppliers (such as building management).

Shine recognises the importance of monitoring and mitigating the above key risks and has taken the following steps:

- Written acknowledgement of compliance with our Modern Slavery Policy and Supplier Code of Conduct was requested from cleaners and landlords (which was received to the extent considered acceptable having regard to the relevant supplier); and
- Receipt of acceptable modern slavery policies from some key suppliers (including our stationery supplier).

Assessing the effectiveness of actions taken to address modern slavery risks

A team has been assembled with Shine (including the General Manager – Corporate Services, General Counsel and Internal Audit and Risk Manager) to develop a process for the effective monitoring of modern slavery risk and developing measures which are appropriate to the size and nature of the business, including ongoing training and awareness of our people.

The Internal Audit & Risk Manager will report on a regular basis to the Audit & Risk Management Committee of the Board of Shine Justice Ltd about any reports of modern slavery which are received.

The process of consultation with entities within the Shine Justice Group

The team which has been assembled to implement a program to detect and mitigate modern slavery risk includes the company secretary of each entity in the Shine Justice Group, who acts as liaison with those entities.

The specialised training which has been developed is provided throughout the Shine Justice Group so that reporting of any relevant concerns is facilitated.

Further steps

The process which has been implemented to date will be further refined and enhanced with a view to:

- regular and consistent training of our people to raise awareness;
- documentation of due diligence processes where appropriate for new suppliers;
- annual review of our Modern Slavery Policy and Supplier Code of Conduct at Board level; and
- regular consideration of the risk of modern slavery by the Board's Audit & Risk Management Committee.

This statement has been approved by the Board of Shine Justice Ltd.



Simon Morrison
Managing Director & CEO

17 March 2021

Annexure A – Group Company Structure Chart

Shine Justice Group Corporate Structure as at March 2021

