



Modern Slavery Statement 2020/2021

This Modern Slavery Statement (**Statement**) is given jointly by MinterEllison (ABN 91 556 716 819) and Minter Ellison Services Pty Ltd (as trustee for the Minter Ellison Services Trust) (ABN 55 971 237 295) and covers certain Australian affiliated entities and other entities we own or control and businesses we operate, including MinterEllison Consulting and IT Newcom Pty Limited. Any references to “we”, “us”, “our” or the “firm” are references to the two reporting entities and the entities they own and control.

This Statement has been prepared in accordance with the requirements in the *Modern Slavery Act 2018 (Cth)* for the reporting period 1 July 2020 to 30 June 2021. It was approved by the MinterEllison Partnership Board on 25 November 2021 and by the Board of Minter Ellison Services Pty Ltd on 25 November 2021.

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MinterEllison's purpose

We are an Australian based law firm and our purpose is to create lasting impacts with our clients, our people and our communities with the work we do each and every day.

We make this Statement as a further commitment to fulfilling our purpose. Reducing the risks of modern slavery in our supply chains is one of the many ways we seek to positively impact personnel who are directly and indirectly involved in our firm, as well as the broader community.

With a strong commitment to continuous improvement and to undertake the work necessary to minimise the risk of modern slavery in our operations and supply chains, we set out in this Statement our firm's current approach and future commitments to understanding, identifying and addressing modern slavery risks in our operations and supply chains.

Our structure and operations

MinterEllison is a partnership. The firm is led by our Chief Executive Officer and Managing Partner, Virginia Briggs and the Executive Leadership Team, with supervision from the MinterEllison Partnership Board, chaired by David O'Brien.

Minter Ellison Services Pty Ltd is the trustee of a services trust which provides administrative and support services to the firm. The MinterEllison Partnership operates a number of adjacent and complementary businesses including MinterEllison Consulting, Flex (a division of the firm) and IT Newcom.

The firm primarily operates within Australia, and as at 30 June 2021, we had over 2800 staff working in Sydney, Melbourne, Brisbane, Canberra, Perth, Adelaide, Darwin, and staff in representative offices Shanghai and Beijing.

We offer an integrated suite of legal and consulting services including:

- a full range of corporate and commercial legal services and advice to both private and Government clients across various industries;
- consulting services covering technology, tax, risk and regulatory, and infrastructure; and

- information technology consulting and advisory services.

Our team collaborates across Australia, New Zealand, Asia and the UK to deliver seamless services to our clients. We work with a network of associated entities, including MinterEllison LLP (Hong Kong), MinterEllison LLP (Ulaanbaatar), MinterEllison (London), MinterEllisonRuddWatts (New Zealand) and a legal practice operating in the Gold Coast, which are licenced to use the name MinterEllison. These associated entities are not owned or controlled by MinterEllison or Minter Ellison Services Pty Ltd.

Our supply chain

As a professional services practice, our principal activities involve the provision of legal and consulting services to our clients. We require certain goods and services to conduct our operations and deliver our services to our clients.

The majority of goods and services that we procure come from suppliers based in Australia. The main categories of goods and services that we procure (directly and indirectly) are:

- **Information and communications technology (ICT):**
This includes computer hardware and software, cloud services, virtual data room services, virtual document exchange services, printers, audio/visual equipment and services, desk phones and mobile phones
- **Business services:**
This includes supply of our office furniture and fit outs, stationery and branded items, knowledge subscription services, document archiving and management services and courier/postal services as well as printer maintenance services and document printing services. During FY20/21, our offices in Canberra and Melbourne moved to new premises.

- **Professional services:**
Including taxation, external legal counsel, consulting services, professional and personal development, and welfare training programs.
- **Office facilities management:**
The services that we use to maintain our offices, including leasing, office maintenance services, utilities, cleaning and security.
- **Mobility and travel:**
This includes vehicle and airplane travel bookings and accommodation bookings. During FY20/21, our level of expenditure for mobility and travel was significantly reduced compared to the previous year due to the impact of COVID-19.
- **Hospitality and catering:**
Including onsite and offsite catering and events. During FY20/21, our level of expenditure for hospitality and catering was significantly reduced compared to the previous year due to the impact of COVID-19.



Assessment of modern slavery risks



Approach to risk assessment

Key to the development of our approach to assess modern slavery risks associated with our operations and supply chains was the establishment of a dedicated group, comprised of partners and representatives from our legal, risk and business operations, including procurement and information technology teams (**Working Group**).

In our first year of reporting, the Working Group analysed our firm's procurement spending to inform our risk assessment approach and to identify potential areas we might cause, contribute or be directly linked to modern slavery. A risk assessment methodology was developed taking into account a number of risk factors (see FY19/20 MinterEllison Modern Slavery Statement).

During FY20/21, the firm's new Chief Risk Officer joined the Working Group. The Working Group examined the learnings from the previous year and made improvements to the firm's risk assessment approach. The improvements we have made are discussed further on page 8 below.



ICT suppliers

The ICT sector poses some level of risk of forced labour in certain regions and there is generally a lack of public information on ICT supply chain management, including with respect to the materials and components in ICT hardware. There is an inherent risk that our procurement of ICT hardware is linked to modern slavery practices, most prevalent in the raw material extraction, manufacturing and disposal stages.

Approximately 40 of our material ICT suppliers, including software providers, have completed our Modern Slavery Risk Assessment Questionnaire (**Questionnaire**). The application of our risk assessment methodology to the Questionnaire responses from our ICT suppliers did not produce any high risk ratings. Some suppliers did produce a medium risk result due to having a global support model that included post-sale services in countries with a higher prevalence of modern slavery according to the Walk Free Foundation's Global Slavery Index,

such as India and the Philippines. A number of ICT suppliers also engaged subcontractors in the provision of goods/services provided to the firm and some of the subcontractors are located in countries with a higher prevalence of modern slavery.

Case Study:

An IT software supplier provided inadequate and inconsistent responses to our Questionnaire. Applying the risk assessment matrix, the procurement team was prompted to escalate concerns with the legal and risk members of the Working Group.

Upon further investigation, we discovered the Questionnaire was completed by a two person sales team located in Sydney, while the supplier was a global IT organisation headquartered in India employing thousands of staff.

The risk findings were shared with our IT team which purchased the software for firm use. Follow up calls were made with the supplier

to request the Questionnaire to be completed by head office for their whole organisation. Our requests went unheeded and we were unable to obtain additional information to address our concerns including the vendor employees' susceptibility to modern slavery practice.

Using the limited information, the supplier was categorised as medium risk and escalated to our Chief Risk Officer who endorsed the risk rating taking into account of the factors mentioned above. An internal decision was subsequently made to go back to market to consider other suppliers before the licence renewal expired.



Assessment of modern slavery risks

Other suppliers of services / third party arrangements

The other potential modern slavery risk we have identified through our risk assessment process is in sectors where a large portion of people are paid the minimum wage or are new migrant workers. These sectors include accommodation services, office premises cleaning services and hospitality and catering services.

These types of services are often indirectly procured by the firm through outsourcing and third party contracting arrangements.

MinterEllison directly engages approximately 38 catering and waitering employees across our Australian offices. The majority of the staff are employed on a permanent and full time basis. All of our catering staff are engaged under a written employment agreement under which they are entitled to

above minimum-award wages. The relevant award provides entitlements to other benefits such as overtime and allowances. We perform regular reconciliation of amounts paid against award entitlements based on hours worked for the purposes of ensuring award compliance.

We performed desktop analysis of our non-ICT suppliers against a range of modern slavery risk indicators. During FY 20/21, we began utilising our online Questionnaire to engage with non-ICT suppliers, including suppliers which take part in our competitive tender process.

We are focused on understanding any risks that may be present in cleaning services we obtain directly or arranged through facilities services provided by our office landlords. We recognise cleaning services

are a high-risk sector in Australia with low skilled and migrant work force presenting opportunities for exploitation and layers of subcontracting to obscure labour conditions.

Following additional due diligence work on our supply, we identified no additional factors which indicate that the risk profile for our operations or our suppliers has increased from our FY19/20 Statement, supporting our view that our overall risk of causing, contributing or being directly linked to modern slavery through our operations and procurement of goods and services is low.

Case Study: modern slavery questionnaire and risk assessment

Our risk assessment tools are utilised during competitive procurement tenders to enable us to take into account modern slavery risk factors. We recently completed a major print services tender for our Australian offices and the Questionnaire response from each of the two shortlisted providers was analysed and compared. Each tenderer provided information relevant to the print services and devices to be provided to MinterEllison.

We considered the modern slavery risks associated with both local and international service centres and manufacturing plants which would form a part of the MinterEllison supply chain. Further, we took note of the suppliers' acknowledgement of weakness in their understanding of their supply chain as a measure of their openness and commitment to improve.

Adding modern slavery risk as a non-financial assessment criteria in the firm's tender evaluation process has improved our knowledge of and engagement with the successful supplier.



Assessment of modern slavery risks



MinterEllison policies

Our assessment of the risk of modern slavery in our operations and supply chains has been carried out against the background of our existing policies and procedures aimed at ensuring a safe and just working environment for our staff and our suppliers. These include:

- **Integrity Policy:**
In addition to our usual grievance procedures, this policy sets up channels for reporting genuine queries, concerns, grievances or complaints regarding illegal, unethical, unprofessional or unsafe conduct occurring at our practice.
- **Anti-Bribery and Anti-Corruption:**
Consistent with our culture of trust, integrity and fairness, this policy outlines a zero tolerance for bribery and corruption.

- **Anti-Discrimination and Harassment:**
This policy applies to all our operations and covers our policies and procedures relating to discrimination and harassment.
- **Code of Conduct:**
This sets out how all members of our practice must conduct themselves to uphold our values and deliver on our purpose to create lasting impacts with our clients, our people and our communities.
- **Empowerment, Inclusion and Diversity:**
This policy aims at leveraging our diversity through a culture of inclusion and collaboration to promote our values in the workplace.

- **Work Health, Safety and Wellbeing:**
This policy outlines our commitment to building a safe workplace and summarises the important rights and obligations in relevant work health and safety legislation.
- **Responsible Procurement Policy:**
This policy applies to the purchase of goods and services by MinterEllison and seeks to ensure that the goods and services we purchase are consistent with, or at a minimum, reflect the ethical commitment set out in the principles of the UN Global Compact.
- **Procurement Compliance Standards:**
These standards complement our Responsible Procurement Policy and sets out our minimum expectation for our suppliers. The Standards include amongst others ethical business practice, workplace health & safety, modern slavery, diversity and inclusion and sustainability.



Actions to assess and address modern slavery risks

During FY 20/2021, we carried out all of the future actions proposed in our FY19/20 Statement:

Proposed action	FY20/21 actions
Develop risk assessment and mitigation tools, such as a standard modern slavery questionnaire and template supply contract terms to address modern slavery risks, and introduce these tools into the firm's procurement process.	<p>We replaced the manual process for gathering vendor responses to the Questionnaire with a bespoke online questionnaire created on a specialist platform. The implementation of an online questionnaire allowed us to create logic that showed suppliers' mandatory questions that were specific to their supply of goods and services to MinterEllison, which facilitated greater engagement and compliance from our suppliers.</p> <p>We revised the weighting in our Modern Slavery Risk Assessment Matrix (Matrix) to take into account the country risk of both the supplier and their subcontractor (if any), and to capture both quantitative and qualitative assessment factors. We adopted standard modern slavery contractual terms in our procurement agreements to seek commitments from our vendors to reduce modern slavery practices in their operations and supply chain.</p>
Update our procurement policy and develop standards which set out the minimum expectations for our suppliers and third party labour providers to operate ethically, including to address modern slavery risks in their business and also in their suppliers.	We revised MinterEllison's Responsible Procurement Policy to take into account modern slavery risks in our supply chain and adopted new Procurement Compliance Standards to set out minimum requirements expected of our vendors. The Procurement Compliance Standards were rolled out to new suppliers as part of the conditions of providing goods/services to MinterEllison.
Capture any reported incidents of modern slavery within the firm or within our supply chain, undertake prompt investigation and reporting, and remediate or mitigate risk of repeated occurrence.	No modern slavery incidents were identified amongst our suppliers during FY20/21.
Implement specific training in relation to the modern slavery risk management tools.	We conducted regular training to facilitate the implementation of our risk assessment tools.

Assessing the effectiveness of our actions

Our actions to assess and address modern slavery risks were overseen by the Working Group which met monthly to:

- initiate annual review of our modern slavery risk assessment methodology;
- monitor progress against the project plan;
- monitor implementation and publication of new and updated policies concerning modern slavery; and
- share insights and new developments in modern slavery reporting under the Modern Slavery Act 2018.

Quarterly updates were provided to the MinterEllison Partnership Board to keep the directors updated on the project progress.

The actions the Working Group undertook during FY20/21 contributed to the following improvements in MinterEllison's engagement with our suppliers:

- enhanced procurement process by including appropriate due diligence before entering into contracts, including to carry out modern slavery risk assessment via the online Questionnaire and standardised Matrix;

- better understanding of our suppliers, their operations and supply chain, by close engagement to resolve concerns about the supplier's operations or supply chain from their response in the questionnaires;
- increased formalisation and centralisation of the firm's procurement process, record keeping and management of suppliers; and
- defined internal escalation processes to ensure identified risks and concerns are brought to the attention of senior personnel and the product/purchase sponsor, and a response plan is followed.



Consultation

MinterEllison consulted with its owned and controlled entities in the development of this Statement. The Statement was prepared by the Working Group comprised of representatives of partners who are leading our firm's modern slavery risk management practice, procurement teams and General Counsel and Risk teams. The Working Group prepared and implemented a project plan which was endorsed by the firm's Executive Leadership Team to prepare this Statement. Members of the Working Group engaged with business units across the firm, including Finance and client practice groups, to understand the firm's supply chain. The Working Group worked collaboratively to develop and implement the modern slavery project plan and to prepare this Statement. The Working Group referred the Statement to MinterEllison Consulting and IT Newcom Pty Limited for feedback, which led to an open discussion on the reporting requirements and the Working Group's project plan.

The Statement was reviewed by the Executive Leadership Team, prior to formal adoption by the MinterEllison Partnership Board and Minter Ellison Services Pty Ltd.

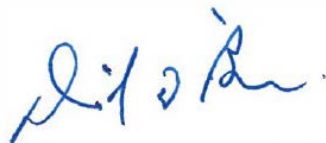
Other information – future actions

With our focus on continuous improvement and building on the knowledge gained from our due diligence and risk assessment, our plan is to take the following actions during our subsequent reporting periods to reduce the risk posed by modern slavery in our supply chains:

- to take a risk based approach in our engagement with suppliers by applying the Questionnaire on selected categories of suppliers;
- to identify and implement improvements in our procurement arrangements to address modern slavery risk;
- to increase utilisation of modern slavery risk mitigation tools developed by the Working Group; and
- to develop and implement a remediation plan to address findings of modern slavery practice in our supply chain.

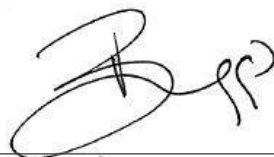
Dated: 26 November 2021

Signed by:




David O'Brien

Chairman of the Board of MinterEllison



Virginia Briggs

Chief Executive Officer and Managing Partner of MinterEllison



Peter Coats

Chairman of the Board of MinterEllison Services Pty Ltd