

Maurice Blackburn **Statement on** **Modern Slavery and** **Human Trafficking**

For the period 1 July 2019 to 30 June 2020

Letter from the CEO

Maurice Blackburn is proud to be Australia's leading social justice law firm. We've built a reputation on the unwavering belief that the law should serve everyone, not just those who can afford it.

That's why we're here for everyday Australians who deserve to have their rights defended, people who deserve the:

Right to be free

To live without the threat of persecution or oppression.

Right to feel safe

To live and work without physical or emotional threats.

Right to be heard

To not be silenced by the wealthy, privileged or powerful.

Right to equality

To be respected as human beings and free from prejudice.

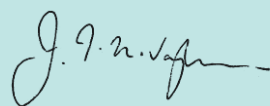
We have contributed to some of Australia's most influential legal decisions, from the 40-hour week and equal pay for women and Indigenous workers, to the fight against patenting of human genes and the largest class action settlement in Australian history. All people should be treated fairly and with respect in the Australian justice system. Our legacy grows as we continue to protect the exploited, free the wrongfully detained and hold the big names to account. Although we've been leading the charge for more than a century now, as far as we're concerned, the fight for fair has only just begun.

Modern slavery is the act of denying someone their freedom and independence through deception, coercion, and use of violence. Perpetrators of this crime target the most vulnerable members of the community, to exploit them for profit. Through our work with trade unions and their members as well as with community groups and professional networks we have advocated for workers who have struggled to find a voice in the legal system.

We welcome the introduction of the *Modern Slavery Act 2018* (Cth) and the opportunity to investigate where, in our operations and supply chain, people may be vulnerable to exploitation and, if detected, take appropriate action, and strengthen our firm's commitment to stand against labour exploitation in Australia.

In drafting this statement, we acknowledge our responsibility and make a commitment as a business to respect and uplift human rights recognised in the *United Nations Guiding Principles on Business and Human Rights*, the *International Bill of Human Rights* and the *International Labour Convention Declaration on Fundamental Principles and Rights at Work*.

We are committed to ensuring people's respect and dignity. We are committed to justice not only in the courts but in the decisions we make every day as a firm and as part of the community.



Jacob Varghese
CEO, Maurice Blackburn

Reporting Entity

This Statement is made on behalf of Maurice Blackburn Pty Limited (ABN 21 105 657 949), the reporting entity under the *Modern Slavery Act 2018* (Cth) (**Act**), and makes this statement pursuant to section 13. It includes voluntary statements from the following entities as they operate under the same corporate policies and values as Maurice Blackburn:

- Zabulon Pty Ltd (ABN 50 005 114 670)
- Claims Funding Australia Pty Ltd (ACN 158 551 967)
- Zabulon Holdings Pty Ltd (ABN 128 858 113)
- Maurice Blackburn SA Pty Ltd (ABN 641 011 216)

This statement covers the reporting period of 1 July 2019 to 30 June 2020.

Maurice Blackburn Pty Limited is an incorporated legal practice and its shareholders control a sister corporation, Zabulon Pty Ltd (ABN 50 005 114 670) (Zabulon). While Maurice Blackburn Pty Limited employs legal professionals, Zabulon is the entity that employs the administrative and support staff that facilitates Maurice Blackburn's essential business functions.

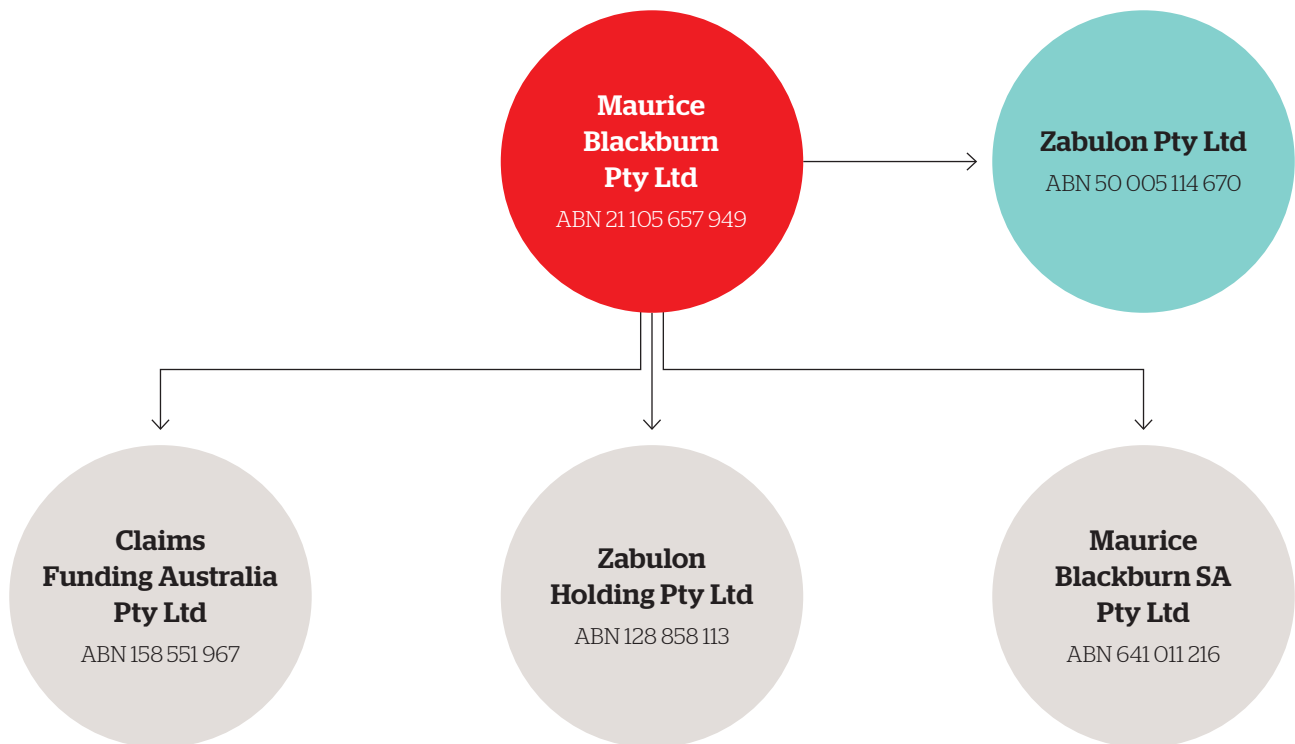
For the purpose of this statement, 'Maurice Blackburn', 'we' and 'our' collectively refers to Maurice Blackburn Pty Limited (ABN 21 105 657 949) and Zabulon.



Structure, Operations, Supply Chain

Structure and Operations

Our structure is as follows:



Maurice Blackburn is a national firm with over 30 offices throughout Australia and more than 1,100 of the country's best and most respected legal professionals. We provide accurate and confidential advice without unnecessary legal jargon, and we recognise the varying financial circumstances of our clients and offer a flexible fee policy. We treat every client who walks through our door with the sincerity and respect they deserve.

We provide a range of professional legal services including:

- Personal injury law
- Class actions
- Superannuation and insurance law

- Financial services disputes
- Wills and estates
- Employment law, and
- Social Justice Law.

Our offices located in Victoria, New South Wales, Queensland, Western Australia, South Australia and the Northern Territory.



Maurice Blackburn owns three subsidiaries:

Subsidiary		Office location	No. of employees
Claims Funding Australia (ABN 158 551 967)	Litigation funding company	Australia	9
Zabulon Holding Pty Ltd (ABN 128 858 113)	A holding company established to hold shares for Claims Funding International	Australia	0
Maurice Blackburn SA Pty Ltd (ABN 641 011 216)	Entity established for trust purposes	South Australia	0

Supply Chain

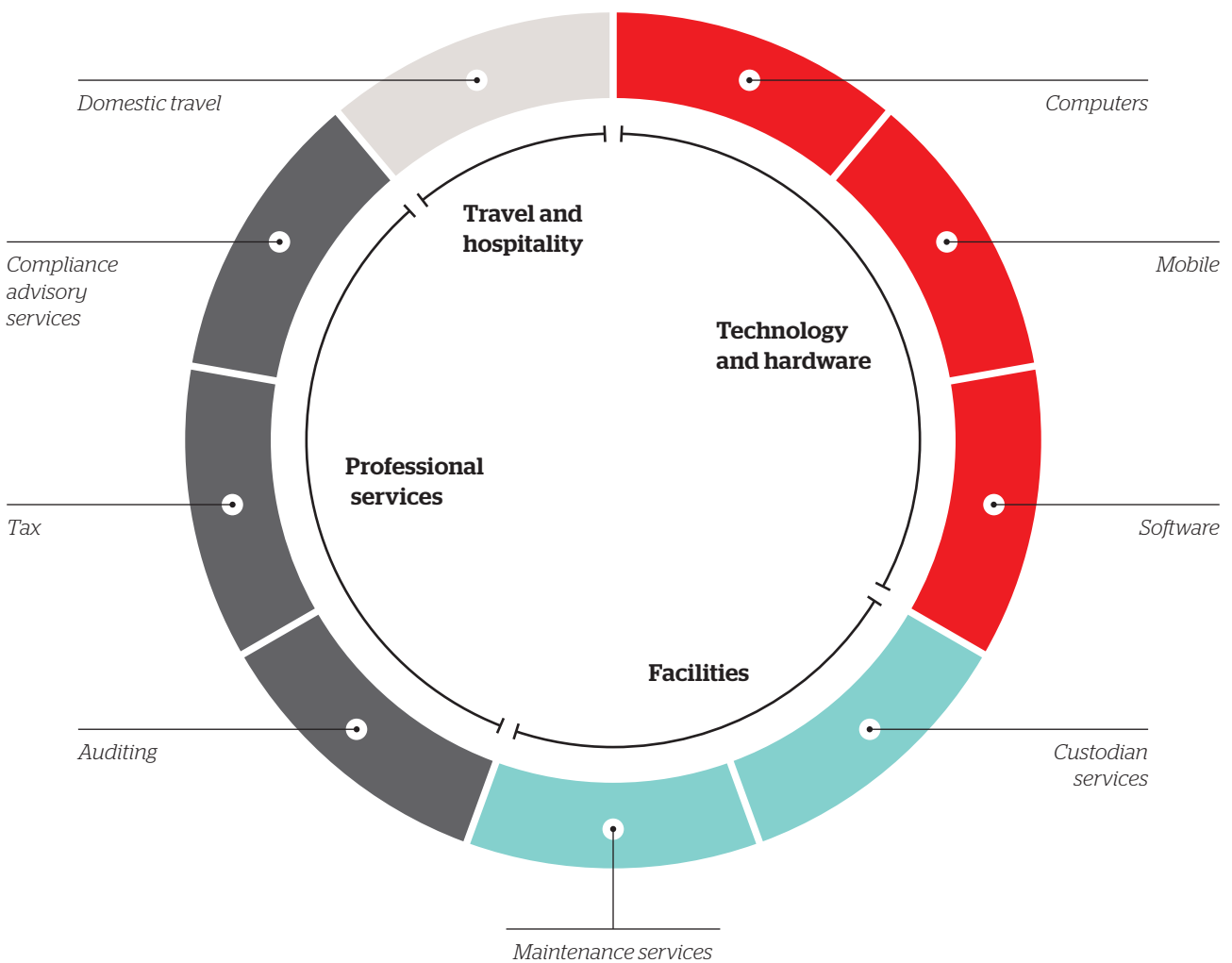
For our third-party engagement, the firm values trusted partnerships and prioritises maintaining long term relationships with suppliers that are fair and honest in their conduct. While procurement activities are conducted by either Maurice Blackburn or Zabulon, they are generally managed by Maurice Blackburn's Finance department.

At Maurice Blackburn, we engage professional services companies to provide essential business services, such as marketing, insurance, tax advisory and audits. We also procure the necessary services of specialist legal experts, such as barristers, on behalf of our clients.

Zabulon is responsible for maintaining supplier contracts in relation to lease agreements, IT equipment, custodian and maintenance services.

Our vendors are predominately located in Australia with some in the Netherlands, United States, and United Kingdom. The main types of goods and services we procure include:

- **technology and hardware** - computers, mobile, and software purchases
- **facilities** - custodian and maintenance services for Maurice Blackburn locations
- **professional services** - auditing, tax, and compliance advisory services, and
- **travel and hospitality** - domestic travel to connect with clients or other legal professionals.



Modern Slavery Risk Identification

Like most professional service firms, the primary and most complex entry point for modern slavery comes from our supply chain. We are aware that no industry is immune to modern slavery and there is inherent risk in the goods and services procured by our direct suppliers. We will be embarking on a supplier due diligence project in the next reporting period. In the meantime, we have engaged an external expert to interview staff across Facilities, Finance, and Marketing to identify potential higher risk supplier relationships including, but not limited to:



Commercial cleaning services

Including any cleaning, restoration, and general building maintenance that has been contracted by Maurice Blackburn or our building manager. This sector traditionally has higher reports of underpayment and employees using higher rates of subcontracting to avoid paying entitlements and hence is a key focus for our firm in seeking to minimise this risk.



ICT purchases and offshore software development

Like many professional services firms, to maintain our online platform and online promotions we engage third party professionals to supply hardware and software as a service or one-off product. In a global market, these goods and services can be conducted overseas and within geographies that may not have the same level of labour protections afforded in the Australian workforce, and hence is another key area for vigilance.



Branded merchandise

Maurice Blackburn may at times procure branded merchandise, including apparel, kitchenware, or novelty goods. It is likely that a number of these items or their components are produced overseas, where the risk of modern slavery is greater at assembly and/or manufacturing stages.

¹ INCLEAN MAGAZINE, The industry that's cleaning up modern slavery. Published 23/10/2019 at <https://www.incleanmag.com.au/the-industry-thats-cleaning-up-modern-slavery/>

Modern Slavery Risk Management

We rely on a diverse pool of talented professionals to provide legal services to clients and operate vital business functions. We have an affirmation statement, About Maurice Blackburn, which speaks to our values including to “treat others fairly and with respect”. This translates into our ‘all in commitment’ on anti-discrimination and inclusion reflected in our:

- New Starter and Induction Policy
- Grievance Procedures Policy
- Change of Employment Conditions Policy
- Contractor Management Policy

We have implemented and continuously improve our payroll management systems and reporting mechanisms available in-house and through external partners. We believe that these policies, in conjunction with legal profession regulation that exists in the Australian states we operate in, does limit the risk of our workforce being subjected to modern slavery, but we are committed to continuing to take a proactive approach to these issues to ensure this remains the case. In our practice there is a possibility we would represent survivors of modern slavery, but this is outside the scope of the Act.

During the FY2020 reporting period, we shifted priority to remote working in response to health and safety concerns raised during the COVID-19 pandemic.

Maurice Blackburn started preparing its modern slavery response in March 2020, which was to include an in-house supplier due diligence assessment. The project was suspended to 2021 due to public health concerns and the economic impact of shutdowns.

While COVID-19 limited our ability to implement additional controls specific to modern slavery risk beyond those already in place, we continued to mitigate risks that emerged including:

- Finance managers have included custom terms and conditions in contracts to mitigate the risk of excessive working hours, and
- Public Affairs managers have taken additional steps to verify and prioritise events and catering service providers that create positive impacts in the community.

As our modern slavery response matures, we will continue to take steps to assure our trust in vendors with practical due diligence stages and direct, honest engagement with our suppliers.

Prior to our first reporting period, facilities managers identified concerns relating to a potential supplier later found underpaying staff. Facilities responded to this by engaging a different supplier that engaged with third party authenticators to promote fair pay.

Maurice Blackburn maintains two reporting mechanisms for employees to raise grievances and concerns:

Whistleblower Policy	Grievance Procedure Policy
Intended for internal and external reporting at Maurice Blackburn to submit reports of potentially criminal or unethical behaviour	Internal reporting at Maurice Blackburn to raise issues of management and personal grievances
The Policy is publicly accessible here	Policy is available to staff on the intranet
Eligible whistle-blowers are encouraged to report concerns without fear of retaliation	Employees are encouraged to file a grievance when informal resolution tools have been exhausted
People and Culture team will investigate the report and the issue and may determine if corrective action is required	People and Culture team will investigate the grievance and may determine if remediation is required.
Both policies are owned and operated by Maurice Blackburn’s People & Culture Team	



The **COVID-19 pandemic** was a drastic change for all Australian businesses, even for those able to adjust to remote working and lockdown restrictions. During 2020, Maurice Blackburn acted on the advice of state and federal governments to promote distance working and engage with our commercial cleaning suppliers to implement COVID-19 safe services for a healthy work environment.

Maurice Blackburn also did not have any redundancies due to COVID-19.

Many Australians have been under financial pressure due to COVID-19 and may have been manipulated into unfair or unsafe working conditions. For these workers, Maurice Blackburn prioritised maintaining our practice to continue our firm's purpose of equal access to legal advice and representation as necessary.

Maurice Blackburn did not request any discounts due to COVID-19 from suppliers. We honoured all our agreements. During lockdowns, cleaning and security services were decreased, however since the completion of lockdown we have increased their services.



Assessing effectiveness

We have not implemented any specific modern slavery controls and subsequent performance targets and indicators during the first reporting period. However, Maurice Blackburn is forming a modern slavery working group, who will play a central role in the governance, implementation, and monitoring of our modern slavery response.

In the upcoming reporting period, we will engage an external expert to:

- review our existing policies and procedures against the UN Guiding Principles on Business and Human Rights (UNGPs); and
- assist in developing a three-year strategic plan. The purpose of this plan is to ensure activities, timelines and accountabilities are well articulated across the organisation so that we demonstrate continuous improvement year after year in our response to the Act.

Consultation

Maurice Blackburn, as the sole shareholder of Claims Funding Australia and Claims Funding International in addition to being a significant shareholder of Claims Funding Europe, is responsible for engaging its subsidiaries on issues such as modern slavery risk. During the first reporting period, Maurice Blackburn did not conduct any consultation with these subsidiaries.

During the next reporting period Maurice Blackburn will be sharing copies of its inaugural modern slavery statement and modern slavery strategy with the managing directors of Claims Funding Australia, Europe, and International. As Maurice Blackburn is implementing our commitment into governance, policies, and contracts we expect our subsidiaries to implement similar controls were appropriate. Managing directors of subsidiaries will be contacted by the Maurice Blackburn modern slavery working group to report on any new initiatives or changes in approach regarding modern slavery risk management.

Other

At Maurice Blackburn, we believe our employees can be agents of positive impact and change on clients and the community. Providing training on modern slavery to individuals across Maurice Blackburn will impact business and personal decisions. We believe that raising awareness and empowering people through knowledge creates small impacts in the workplace and our employees' personal lives which in turn can have a cascading effect across communities and Australia. This also concerns our General Counsel office, who has attended information events and panels on the Act.

In addition to our legal services, Maurice Blackburn openly engages with the federal parliament, departments and agencies on labour rights, regulation and standards within Australia to provide legislatures with case studies and insights from front line workers. During the reporting period, we submitted eight submissions to committees and agencies on issues including:

- human rights;
- combating child sexual exploitation;
- unlawful underpayment;
- refugees and Medevac;
- mental health; and
- workers' rights with regards to the Religious Freedoms Bills.

Prior to the reporting period, Maurice Blackburn also submitted a response to a parliamentary joint committee into the operation and effectiveness of the *Franchising Code of Conduct*.

This statement has been approved by the Board of Maurice Blackburn on **30 March 2021**.



Steve Bracks
Chair of the Board
Maurice Blackburn