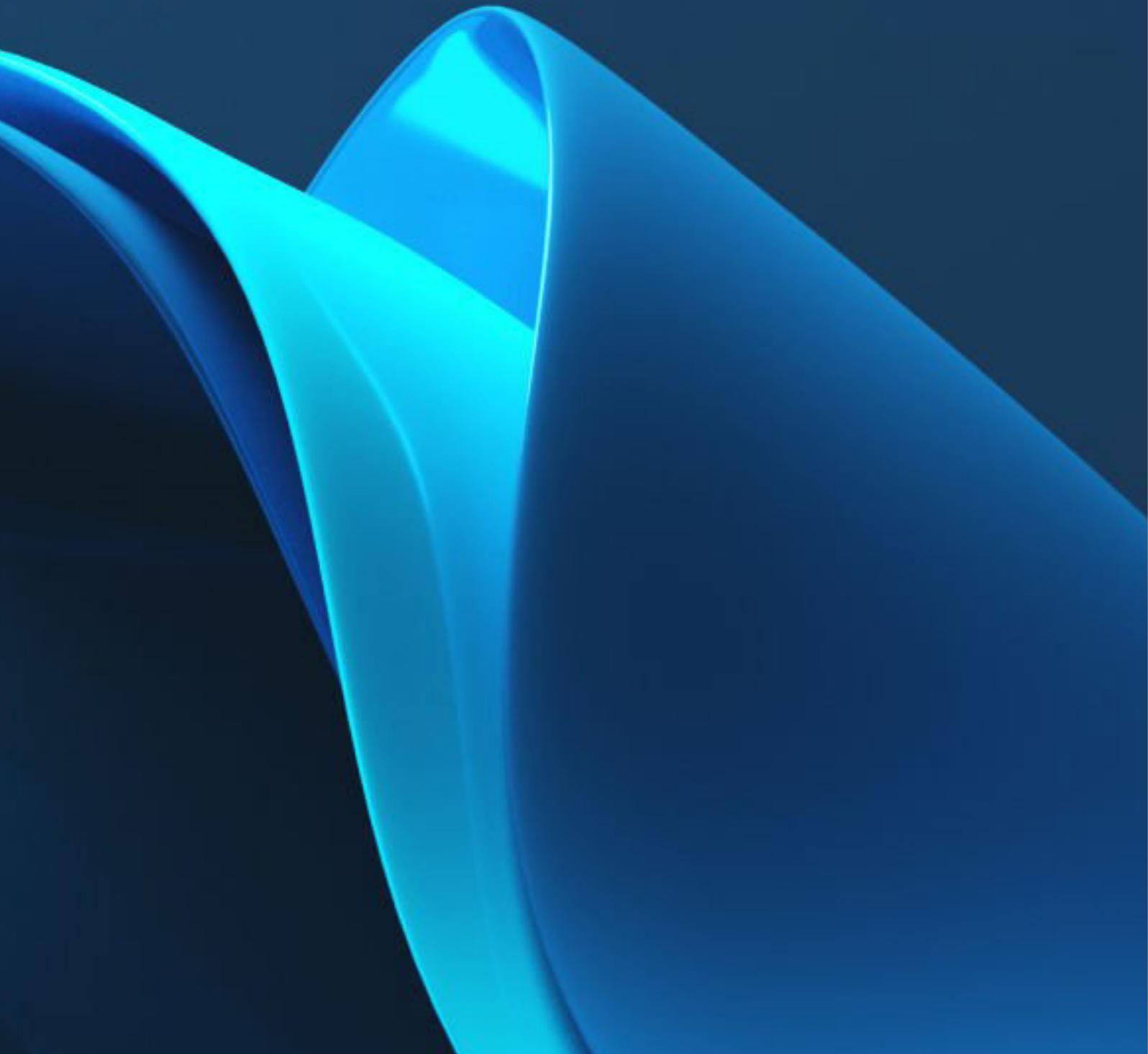


Hall & Wilcox Modern Slavery Statement FY23

Acknowledgement of Country

Hall & Wilcox acknowledges the traditional custodians of country throughout Australia and recognises their continuing connection to land, waters and culture. We pay our respects to their Elders past, present and emerging and to all First Nations people.



Introduction

Hall & Wilcox recognises its responsibility to contribute to the elimination of modern slavery and that responding effectively to modern slavery is a process of continuous improvement. This modern slavery statement (**Statement**), our fourth, demonstrates how we continue to develop systems and invest in ongoing learning around the various components of modern slavery and human rights due diligence and remediation to prevent and address impacts across our operations and relationships, including in supply chains. Our approach aims to be consistent with the UN Guiding Principles on Business and Human Rights (**UN Guiding Principles**).

This Statement has been prepared in respect of the year 1 July 2022 to 30 June 2023 (**Reporting Period**). It is made pursuant to the mandatory reporting criteria in section 16 of the *Modern Slavery Act 2018* (Cth) (**Act**). The table below identifies where each criterion of the Act is addressed in this Statement:

Reporting entity

Hall & Wilcox (ABN 58 041 376 985) is a reporting entity under the Act. This Statement is made in accordance with section 13 of the Act on behalf of the partnership of Hall & Wilcox and the entities it controls, being Francis Gillman Pty Ltd as trustee for the Francis Gillman Unit Trust (**Francis Gillman**), Francis Gillman Finance Pty Ltd as trustee for the Francis Gillman Finance Trust, Francis Gillman Holdings Pty Ltd and H&W Nominees Pty Ltd (**Associated Entities**).

Mandatory criteria for modern slavery statements	Page of this Statement
Identify the reporting entity	3
Describe the reporting entity's structure, operations and supply chains	4-5
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	6
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address those risks, including due diligence and remediation processes	7-8
Describe how the reporting entity assesses the effectiveness of these actions	9
Provide any other relevant information	9
Describe the process of consultation with any entities the reporting entity owns or controls	9

Our structure

Hall & Wilcox is a leading independent Australian law firm with offices in Melbourne, Sydney, Canberra, Newcastle, Brisbane, Perth, Darwin and Adelaide.¹ We are a firm of over 1000 people, including 135 partners. We build partnerships with and service corporate, public sector and private clients, both Australian-based and international. Our success depends upon the success of our clients, our people, and the communities in which we work and live.

Our core practice areas are: Banking and Financial Services, Corporate and Commercial, Litigation & Dispute Resolution, Employment, Insurance, Trusts & Estate Planning, Property and Projects, and Tax. We also have a thriving pro bono and community practice, with a dedicated Pro Bono Partner.

Our commitment to contributing to our communities is embedded in our firm culture. Our pro bono practice embraces our ethical responsibility as a firm to help those in need and enriches the personal and professional lives of the Hall & Wilcox lawyers who get involved.

Our industry focus is on Technology and Digital Economy, Financial Services and Insurance, Health and Community, Public Sector, Environmental Social & Governance (ESG) and Energy, Resources & Utilities.

Our approach

Hall & Wilcox is committed to ESG principles and a sustainable future. Addressing environmental, human rights, modern slavery and other ESG considerations in our operations and supply chains is aligned with our purpose of enabling our clients, our people and our communities to thrive. It is also aligned with our Hallmarks which are our core values and an expression of how we expect our people to go about their work.

Hall & Wilcox is a Participant in the UN Global Compact (UNGC). We are committed to implementing the 10 UN Global Compact principles and advising and supporting clients to implement them also.

Our operations

Hall & Wilcox is a professional services business which predominantly employs professionally qualified and highly skilled people. We have a well-established human resources framework of policies and procedures to ensure compliance with labour laws and regulations and with our core values.

The conduct of our lawyers is regulated by legal profession legislation in each jurisdiction in which we operate, so we consider the risk of causing modern slavery in our operations to be very low.

Francis Gillman provides administrative and support services to Hall & Wilcox and employs all non-legal staff. Corporate Services roles in our operations (including IT, People & Culture, Finance and Operations) are also considered low risk due to their location within Australia and our commitment to operating in compliance with our human resources framework.



Stay true



Better together



Evolve always



Be remarkable

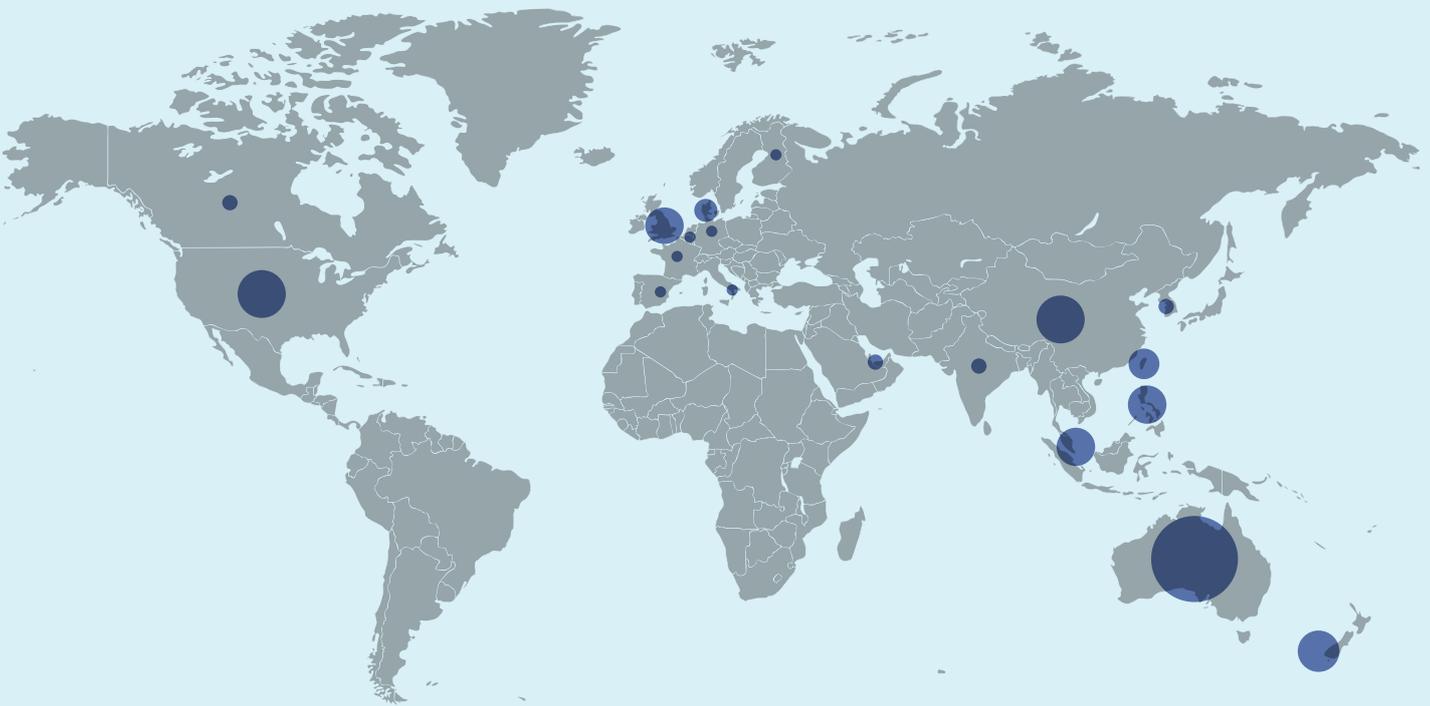


Respect respect

Our supply chains

Our supply chains consist of products and services procured to enable our people to deliver our services. Our procurement is decentralised, with purchasing control granted to departments and to a lesser extent local offices.

The location of suppliers who completed our modern slavery and human rights questionnaire is shown on this map:



Our main categories of procurement



Information Technology
(including professional services)



Facilities Management and
Property Maintenance



Professional and
Technical Services



Memberships and
Subscriptions



Retail Trade



Rental, Hiring and
Real Estate Services



Accommodation, Food
and Entertainment



Education



Motor Vehicles
and Travel

Our risk areas

Hall & Wilcox considers the risk of modern slavery in our operations to be very low due to our commitment to operating in compliance with our human resources framework (as described under 'Our operations').

While most of the products and services we procure are from suppliers with headquarters and/or operational facilities in Australia or other countries with a low risk of modern slavery, we recognise that there is a risk that we, like other businesses, may be directly linked to the modern slavery practices of individuals and entities deep within our supply chains, including those with which we do not have a direct contractual relationship.

We have not identified any specific instances of modern slavery and our analysis has found that most tier one suppliers pose a low overall risk of modern slavery. Where suppliers were connected to an industry/sector and products/services associated with higher modern slavery risk, the risks were mainly associated with the following categories¹:

Information technology – hardware and services

We procure electronic goods and IT support and consulting services directly and through third parties who procure these goods and services on our behalf.

Modern slavery risks are most pervasive in the raw material extraction, manufacturing and disposal stages that are known to attract vulnerable populations in high-risk countries. Our visibility of risks relies on suppliers providing information on their standards and risk management and compliance systems.

Most of these goods and services are procured from multinational IT companies whose modern slavery statements are publicly accessible. As in the previous reporting period, we have reviewed the

latest Modern Slavery Transparency Statement of Hewlett Packard Enterprise Company (HPE), our main supplier of laptops. HPE continued to review its modern slavery risks, including migrant workers in certain high-risk countries in Asia, and to put in place measures to manage these risks within their operations and supply chains.²

In the case of certain smaller sized suppliers in this and other categories, we have made available our supplier modern slavery awareness training module where they have indicated to us in questionnaire responses that their workforce has not completed such training.

Rental, Hiring and Real Estate Services, Facilities Management and Property Maintenance

Cleaning, security, waste, property maintenance and building operations services are procured by the managers of the larger offices we lease. For our smaller offices, many of these services are procured directly by us.

Labour exploitation in the cleaning industry is well documented. A combination of factors heightens the risk of modern slavery, including the high demand for base-skill labour, reduced visibility of labour standards due to outsourcing, and workers from vulnerable populations, including migrant, low socioeconomic or culturally and linguistically diverse backgrounds.

The cleaning service engaged by our building managers in Sydney, Brisbane and Perth (and which we engage directly for additional cleaning regimes) is a participant in the Cleaning Accountability Framework (CAF), a multi-stakeholder initiative which seeks to improve labour practices in the cleaning industry.³ The cleaning service engaged by our building manager in Melbourne has CAF 3 star prequalification.

Accommodation, food, entertainment

This category includes hospitality and catering services used for our events. We must consider that providers in this sector may also rely on base-skill labour procured through outsourcing arrangements and that food industry supply chains have a high risk of modern slavery.

Manufacturing – primarily associated with retail trade

Our procurement in this category includes branded products and merchandise, mainly for gifting clients and internal use. While our suppliers are Australian based, modern slavery risks may exist within the supply chains of the products that we buy, with evidence of human rights issues in apparel manufacturing and a lack of visibility of how suppliers or agents manage these issues.

Our main supplier of promotional products and merchandise is an Australasian Promotional Products Association (APPA) member organisation. As such it must abide by the APPA Code of Conduct.

As in all areas, Hall & Wilcox aims to work with key suppliers who can demonstrate their adoption of safe and fair employment standards and practices.

Our actions to assess and address potential modern slavery risks

Modern slavery working group

Our modern slavery working group is responsible for determining and implementing our modern slavery response. It includes our Chief Operating Officer, General Counsel, Operations Manager and Risk team members, and draws on a range of expertise across the firm, with key actions managed by respective group members.

Modern slavery and human rights questionnaires and due diligence

During the Reporting Period modern slavery and human rights questionnaires were sent to 90 suppliers to assist us with our modern slavery and human rights risk assessments of our suppliers. The questionnaires are part of our sourcing process for new suppliers and ongoing due diligence of existing suppliers identified to be at a higher risk of modern slavery.

Suppliers are asked a range of questions, including if they have assessed whether their business has or is causing, contributing, or is linked to adverse human rights impacts and if they have adequate policies, controls, procedures and training designed to prevent, detect, assess, manage and remedy modern slavery in their operations and supply chains.

The following five key indicators are used to assess a supplier's modern slavery risk:

- 1 country of operations/headquarters;
- 2 industry;
- 3 products attributed to a high risk of modern slavery;
- 4 workforce characteristics; and
- 5 risk-mitigating measures specific to individual suppliers,

in order to provide an indicative modern slavery risk rating of high, moderate or low.

66% of suppliers (59 suppliers) completed the questionnaire. Three suppliers provided their FY22 modern slavery statements (and one supplier provided their modern slavery policy) in lieu of completing the questionnaire. We have reviewed these modern slavery statements, and those of non-responders who have published modern slavery statements to confirm that these suppliers have measures in place or are developing measures to manage modern slavery risks. We engage further with suppliers who did not respond to the questionnaire as part of ongoing supplier management and will continue to use contract renewals as an opportunity to seek outstanding responses.

As in previous reporting periods, most suppliers who completed the questionnaire were assessed to be at a low risk of modern slavery and no supplier was assessed to be at a high risk. The suppliers assessed to be at moderate risk operated predominantly in the Facilities Management and Property Maintenance, Information Technology, and Food and Entertainment categories.

Guided by the results of questionnaires, we determine the level of due diligence we undertake. Where further monitoring or specific action is considered appropriate, we will put in place a program to foster collaborative efforts to address potential risks. In this Reporting Period we made available our supplier modern slavery awareness training module to seven suppliers with a moderate risk rating whose workforce had not completed training on human rights related issues.

With regard to cleaning services, in addition to considering the risk assessments and/or modern slavery statements of our building owners, building managers and cleaning services, and their engagement with the CAF certification process, we have developed our own action plan relating to our cleaning services to look deeper into our supply chain and the underlying drivers of risks and to address these risks.

Policies, processes and templates

During the Reporting Period we finalised and implemented our procurement policy and framework, which was a proposed action in our FY22 modern slavery statement.

The procurement policy references all policies, processes and guidelines relating to procurement, including the social and sustainable procurement policy. It sets out the firm's processes around ESG-related risk assessments, including the modern slavery and human rights risk assessment, further supplier due diligence, and the reporting and remediation of modern slavery incidents (existing and forthcoming).

It provides that approval of a supplier may be conditional on the inclusion of contractual provisions giving the firm rights and assurances with respect to modern slavery that are commensurate with the risk presented. Alternatively, supplier agreement templates may be used which incorporate modern slavery controls for our suppliers and their supply chains.

Training

Our mandatory modern slavery awareness module, part of our induction program for all new starters, aims to develop awareness of how we all intersect with modern slavery in our daily lives and covers the following topics:

- what is modern slavery and the *Modern Slavery Act 2018* (Cth);
- the firm's response to the Act; and
- what each of us can do to help eliminate modern slavery.

Other training initiatives included the firm's Pro Bono Partner and Risk Manager completing the inaugural UNGC Business & Human Rights Accelerator, a six month programme available to organisations participating in the UNGC. The aim of undertaking this programme was to develop a deeper understanding of how to establish an ongoing human rights due diligence process in line with international standards and how to mitigate our human rights impacts, including through grievance mechanisms and remedy. Additionally, the programme facilitates support and collaboration amongst participants, UN partners and experts.

We also made available a modern slavery awareness module to suppliers, which was a proposed action in our FY22 modern slavery statement.

External engagement and other activities

Our Business & Human Rights practice, part of our Employment practice, aims to help businesses, non-profit and public sector entities to develop an approach to human rights that integrates seamlessly with their operations, objectives and brand, and which reflects international human rights standards and best practice. It provides advice and representation to enable businesses to comply with all of their legal obligations in all areas relating to human rights, including working with clients at all stages of the modern slavery reporting cycle. Our pro bono practice also provides specialist advice on human rights law to a variety of clients, including non-profit entities.

The firm published the following reports and articles during the Reporting Period:

- In May 2023 Hall & Wilcox published its first ESG report as part of our commitment to the UN Global Compact principles. This report covers the steps we have taken as a firm in the areas of environment, governance, anti-corruption, human rights and labour, including modern slavery.
- As a member of the Australian Legal Sector Alliance, an industry-led association working collaboratively to promote best practice sustainability commitments and performance across the legal sector, we report annually on topics including sustainable supply chain management.
- Update: *review of the Commonwealth Modern Slavery Act 2018*, 25 August, 2022, by Meg Lee, Fay Calderone and Nathan Kennedy

- *Rise in modern slavery means government and business must do more*, 19 September 2022, by Nathan Kennedy and Meg Lee
- *Strengthening the fight against modern slavery: recommendations from the statutory review of the Modern Slavery Act 2018*, 29 May 2023, by Nathan Kennedy

We also responded to modern slavery questionnaires issued to us by numerous clients as part of their own modern slavery and human rights risk assessments.

How we assess the effectiveness of our actions

To assess the effectiveness of our actions:

- we have compared the response rate to questionnaires for the current and previous reporting period: the improvement from 42% to 66% means we can more effectively consider and potentially reduce modern slavery risks in our supply chains;
 - we have assessed our suppliers against our risk framework to determine their risk profile/rating;
 - we have compared questionnaire responses and risk ratings for the current and previous reporting periods for changes in the risk profiles of suppliers and any associated trends, and have identified some areas where we will work with the supplier to collaborate further on modern slavery awareness;
 - we have monitored the completion rate (97% at 30 June 2023) and feedback on our mandatory modern slavery awareness module for personnel and the number of modern slavery awareness modules that we make available to suppliers (7); and
 - we will continue to develop measures to assess the effectiveness of our actions as further social procurement and modern slavery initiatives are implemented.
- expand our identification of potential risks of modern slavery for suppliers in tier 2 and further down the supply chain;
 - expand the modern slavery controls for our suppliers and their supply chains;
 - adopt a human rights statement and human rights due diligence framework;
 - continue to regularly review our policies and processes; and
 - provide further modern slavery and broader human rights training to key people, including those involved in procurement, which will cover (among other things) the cause, contribute and direct linkage framework and our overarching procurement policy and framework.

Other relevant information – our next steps

Hall & Wilcox is taking a continuous improvement approach to combatting modern slavery, including the following immediate and longer term actions:

- follow up various suppliers who did not respond to the request to complete the questionnaire as part of ongoing supplier management;
- identify suppliers requiring further due diligence and develop a program with suppliers to address potential risks, as required;

Consultation and Board approval

This statement was prepared by our Risk team in consultation with our broader Modern Slavery Working Group, relevant Corporate Services heads and our Pro Bono Partner. The process was inherently consultative due to the shared management and governance of the partnership and Associated Entities.

This statement was approved by the Board of Partners of Hall & Wilcox on 21 November 2023.



Tony Macvean
Managing Partner



Emma Woolley
Chair of Partners

