

Modern Slavery Statement

1 July 2024 – 30 June 2025



Maddocks

A note from the CEO and Chair of the Board

“

At Maddocks, our goal is to make a difference for our clients, each other and the community. Our commitment to human rights is a fundamental part of achieving this goal.”

— CEO David Newman

Whether it’s the work we do for our clients, the way we engage with suppliers, our pro bono program, or supporting human rights initiatives through our charitable program, Maddocks is committed to upholding and promoting human rights, and acting ethically in everything we do.

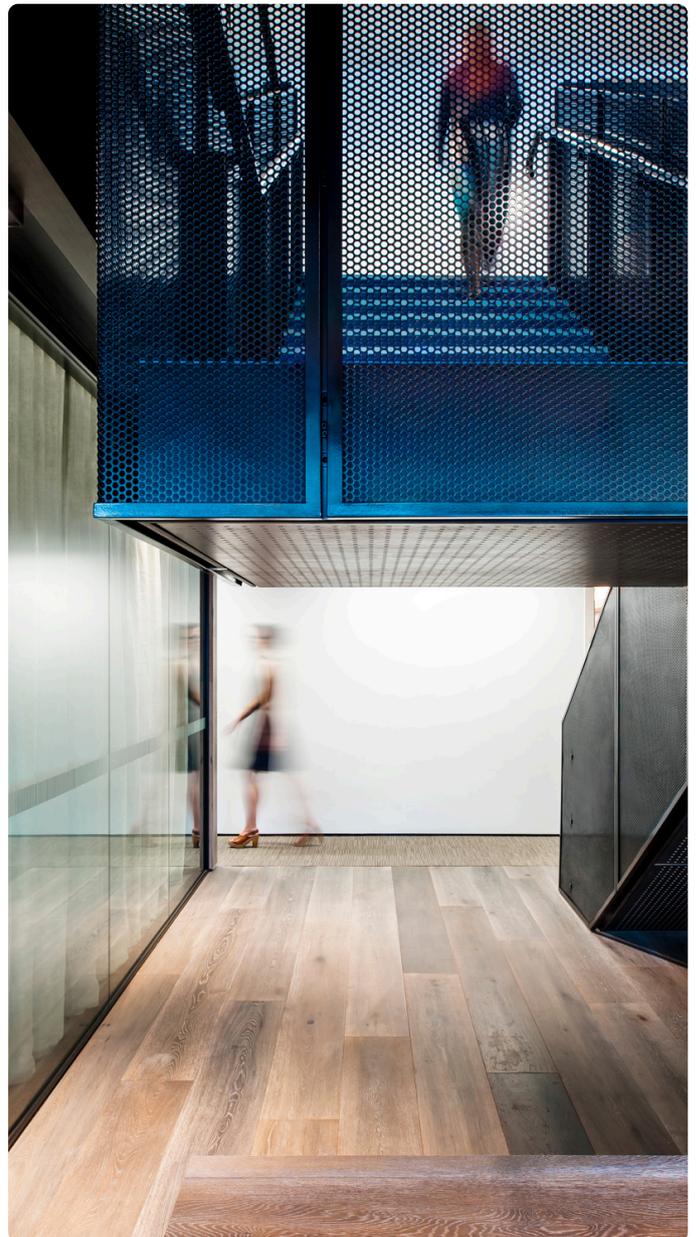
Modern slavery is a global and complex human rights challenge faced by governments and businesses alike, and encompasses exploitive practices such as debt bondage, servitude, child labour, forced labour and human trafficking.

With an estimated 50 million people around the world living in modern slavery, and approximately 41 thousand people in Australia, the issue demands our attention.

We embrace our obligations as a reporting entity under the *Modern Slavery Act 2018 (Cth)*, and recognise the significant role that organisations such as ours can play in preventing worker exploitation.

This is our sixth statement since the introduction of the Modern Slavery Act. It sets out the clear steps that Maddocks has taken during our sixth reporting year (the financial year ending 30 June 2025) to identify, assess and address modern slavery risks within our operations and supply chains.

The steps we have taken this year continue to build on the foundational work completed during our earlier reporting periods, which allowed us to identify modern slavery risks across our supply chains and operations and commence implementing appropriate mechanisms, systems and processes to hold us to account.



Our commitment to continuous improvement

During this reporting period, we have progressed and achieved a number of items identified as key priorities in our last Modern Slavery Statement. These include:

- **continuing with the firm's approach** to educate staff about modern slavery in both the Australian and global context through various forms of training and on-hand resources;
- **updating our modern slavery external website page** that allows current clients, potential clients and the wider public to see what the firm is doing to reduce the likelihood of modern slavery occurring within the firm's operations and supply chains. The website outlines the firm's commitment to its reporting obligations under the Modern Slavery Act and provides copies of our latest Modern Slavery Statement and our Supplier Code of Conduct;
- **publishing an article** in the Australian Legal Sector Alliance Member Sustainability Insight Report 2024 on how to develop policy or strategy that can assist with mitigating risk of modern slavery in the supply chains;
- **using our Risk Assessment Tool** to assess higher risk suppliers in the procurement process;
- drawing on due diligence exercises (in our previous reporting period) to identify our **cleaning services suppliers** as a key area of risk within our supply chain;
- **subsequently engaging with our cleaning services suppliers** using tailored survey questions, to gain a better understanding of how the cleaning services supplier/s are engaged, the policies and procedures in place to monitor compliance and what oversight mechanisms are being used by both building management and the cleaning suppliers to mitigate these risks.

In 2023, Professor John McMillan, AO, conducted an independent review and thorough analysis of the Modern Slavery Act and its operation in its first three years. This review made 30 recommendations to the Australian Government to strengthen the Act. On 2 December 2024, the Australian Government released its response to Professor John McMillan's, AO, independent review and agrees in full, part or in principle to 25 of the 30 recommendations made.

Consultation by the Australian Government with businesses and key stakeholders is currently underway in relation to the recommendations, and we intend to continue monitoring any regulatory developments with interest.

We also welcome the announcement of the appointment of Chris Evans as the inaugural Australian Anti-Slavery Commissioner (**AS Commissioner**) on 7 November 2024. A number of important, new guidance and updates have been published by the AS Commissioner. These include the AS Commissioner's letter, published on 17 July 2025, which has been issued to major law firms, advisory firms, and industry bodies regarding business compliance with the Modern Slavery Act. In the letter, the AS Commissioner seeks the support of law firms, in ensuring that their clients who are required to report under Section 13 and 14 of the Modern Slavery Act, are meeting their obligations. Maddocks has a long standing history of assisting its clients in meeting their obligations under the Modern Slavery Act, however, given this specific request – we intend to communicate with our clients in a manner consistent with the AS Commissioner's Letter.

We intend to review other materials published by the AS Commissioner in the next reporting period to inform our response.

We are pleased to report that we have not identified any specific instances of modern slavery in this reporting period. More importantly, we remain committed to a program of continuous improvement in the years ahead, further developing our systems and controls within our business to effectively prevent and manage the risks of modern slavery.

This statement has been approved by the Board of Maddocks in accordance with the requirements of the Modern Slavery Act (see page 28).



David Newman
Partner & CEO



Mark Henry
Partner & Chair
of the Board

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Criterion 1:

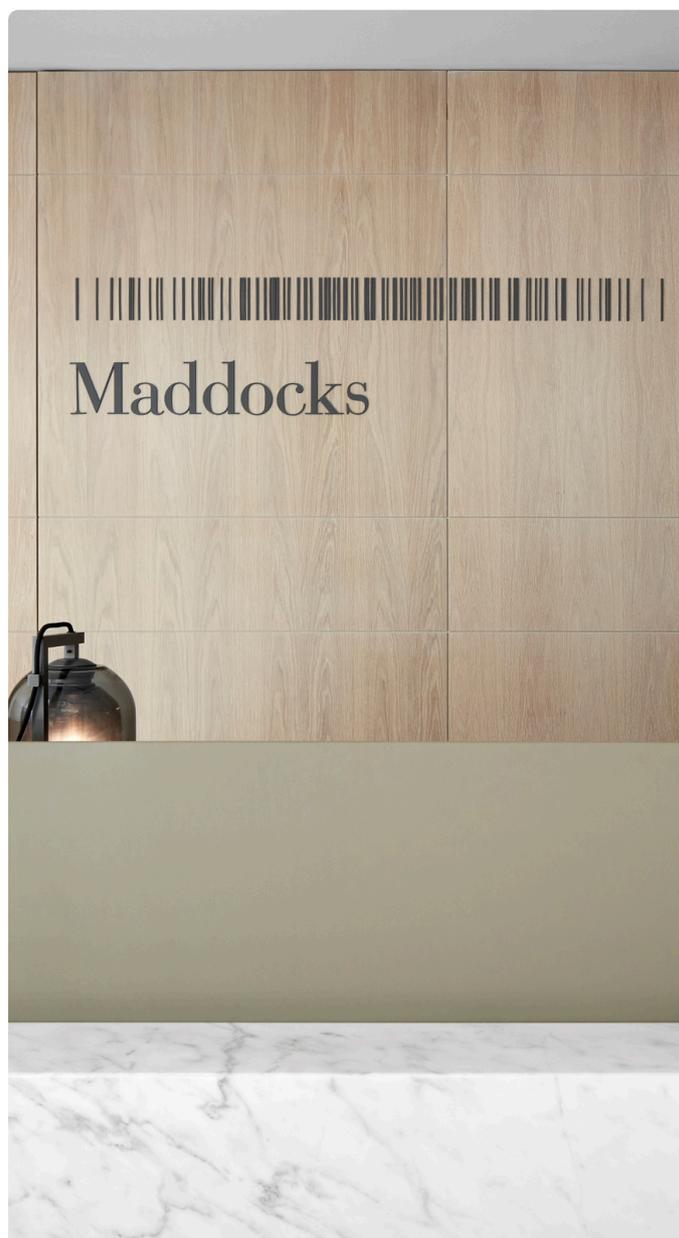
Identify the reporting entity

Section 16(1)(a) of the Modern Slavery Act requires modern slavery statements to identify the reporting entity or entities covered by the statement. This section confirms that Maddocks is the only reporting entity covered by this Statement.

This modern slavery statement (**Statement**) is made by Maddocks ABN 63 478 951 337, Collins Square, Tower Two, Level 25, 727 Collins Street, Melbourne VIC 3008 (referred to as **we, us, Maddocks, the Firm** in this Statement).

Maddocks is a single reporting entity under the Commonwealth Modern Slavery Act 2018 (Cth) (**Modern Slavery Act**) and this Statement is submitted and published for the financial year ending 30 June 2025, in accordance with section 13 of the Modern Slavery Act.

This Statement addresses each of the seven mandatory criteria for reporting set out in section 16 of the Modern Slavery Act.



Criterion 2:

Describe the reporting entity's structure, operations and supply chains

Section 16(1)(b) of the Modern Slavery Act requires modern slavery statements to describe the structure, operations and supply chains of the reporting entity. This section outlines our structure, operations and supply chains, including the nature of our supply chain at a high level.

Our Structure

Maddocks is a proudly independent Australian law firm, operating as a partnership. Maddocks currently has 97 partners, and over 740 employees, nationally. Maddocks wholly-owns Maloch Pty Ltd ACN 005 387 100, which is a service entity providing administrative and other support services to Maddocks.

Our Operations

Maddocks has been providing legal services in Australia since 1885 from our Melbourne office, while we began expanding our operations with the opening of our Sydney and Canberra offices in 2002 and 2012 respectively. Maddocks delivers a broad range of commercial legal services to public and private entities, not-for-profits and individuals throughout Australia and internationally.

Maddocks provides legal advice across a range of sectors and commercial practice areas. Our key areas of expertise include:

- Banking and Finance;
- Construction;
- Corporate and Commercial;
- Dispute Resolution & Litigation;
- Employment & Workplace;
- Government Advisory; and
- Real Estate.

In addition to the Firm's core legal services, Maddocks operated Maddocks Recoveries, our debt recovery agency, during this reporting period.

We have also established Maddocks Foundation, a charitable program which supports community projects and programs by providing annual grants to charitable organisations across Australia.

During this reporting period, there were a total of **nine** charitable organisations that received a Maddocks Foundation grant. The grant recipients operate charitable organisations in a wide range of sectors, which will continue to support the incredible work that they do, including, but not limited to:

- **Providing primary health services** for vulnerable people – including for youth and people experiencing homelessness, disadvantage and marginalisation, mental illness, substance use or complex needs;
- **Providing accommodation** for family and domestic violence survivors – providing refuge housing for adults and children escaping violence; and
- **First nations services** – health, social and cultural services;

Our Supply Chains

Maddocks procures goods and services in the following key categories:

- IT;
- Premises and Facilities;
- Marketing and Business Development;
- Professional services;
- Knowledge, Learning & Development; and
- Recruitment.

The majority of goods and services that we procure come from suppliers based in Australia. Key suppliers are engaged on a long-term contractual basis, while arrangements with smaller suppliers are sometimes short term and ad hoc.



Criterion 3:

Risks of modern slavery practices in our operations and supply chains

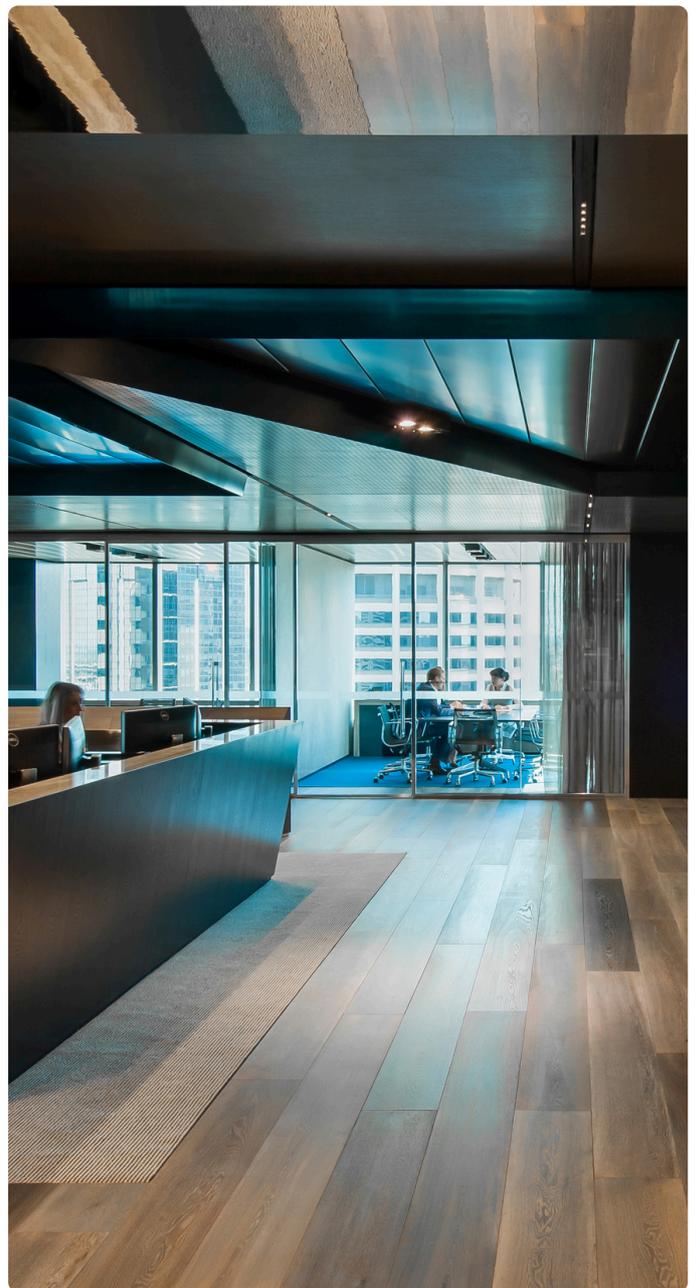
Section 16(1)(c) of the Modern Slavery Act requires modern slavery statements to describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls. This section describes the key risk areas for modern slavery for Maddocks, which mainly relate to our supply chain.

In this section we identify the 'risks of modern slavery practices', meaning the potential for Maddocks to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.

The Modern Slavery Act defines 'modern slavery' as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services.

In our previous reporting periods, Maddocks:

- **completed a detailed scoping exercise** to identify key areas of modern slavery risk in our operations and supply chains based on Commonwealth Guidance;
- **developed and implemented a comprehensive Supplier Survey**, targeting those suppliers identified as posing a higher risk, to help identify modern slavery risks in our supply chains. We provided the suppliers with further educational pieces on how to identify or address Modern Slavery in their supply chains;
- **established our own Supplier Code of Conduct** which has become a key tool when procuring and entering into contractual arrangements with both new and existing suppliers; and
- **completed a detailed scoping exercise** on our **Labour Hire Suppliers** to ensure that the labour hire suppliers engaged by the Firm operate with appropriate recruitment processes and employment conditions for their workers. Where responses suggested areas of concern, we further engaged with the labour hire suppliers with a view to educate and assist with improving both our anti-modern slavery processes and theirs.



We have used the intelligence derived from our earlier scoping exercises, together with the responses to the Supplier Surveys and subsequent requests for further information from suppliers, to identify the operational and supply chain risks described below. The Firm identified our **cleaning services suppliers** provided by our building management as posing a higher risk of modern slavery practices. This is due to the fact that many positions within this industry offer lower wages, the jobs involve manual labour and workers are frequently employed on a casual basis. Workers are also often from migrant, low socio-economic, or culturally or linguistically diverse backgrounds and experience wage theft and other forms of exploitation. The cleaning services provided by our building management have been considered in more depth during this reporting period (see Criterion 4). We also acknowledge that the Commonwealth Guidance identifies cleaning services as a high modern slavery risk industry.

We recognise that the risks of modern slavery practices evolve and we will continue to regularly review our business and any material external factors to consider whether there have been any changes to our identified risks of modern slavery practices.

Risks in our operations

As the key operational functions of Maddocks involve the employment or engagement of staff in our offices located in Melbourne, Sydney and Canberra to deliver legal services or support the delivery of our legal services, Maddocks has assessed the risk of modern slavery in its operations as remaining relatively low.

This risk assessment was made on the basis that the legal services profession is strictly regulated, our operations are located entirely within Australia, and the legal framework and our own policies and procedures which regulate conditions of employment of our staff (further described in Criterion 4 – Actions taken relating to our operations), provide a high level of protection against the risk of modern slavery occurring within our operations.

Similar to our previous reporting periods, the main area of operations we have identified as presenting a higher risk of modern slavery is our charitable program, which supports community projects and programs by providing annual grants to charitable organisations across Australia.

We acknowledge the recipients of our charity program operate in areas which may present higher risks of modern slavery, for example, in marginalised or disadvantaged communities. We continue to build on the steps taken in our previous reporting period to address this operational risk and improve our oversight of this program. Further information about this is outlined in Criterion 4.

Supply chain risks

Through our review of the responses received from the Supplier Survey and subsequent requests for information, we have identified the following key risks in our **supply chain**:

Sector and industry risks

Electronics and textiles both remain high risk industries globally. We understand that the nature of these sectors in which some of our key suppliers operate means that their workforce is more vulnerable to exploitation.

- Maddocks procures IT equipment including phone headsets, mobile phones, laptops, monitors and accessories.
- Maddocks sources sports uniforms.

Product and services risks

Paper and coffee beans are recognised as high-risk products globally. Similarly, services such as cleaning, are also recognised as high-risk.

- Maddocks procures stationery, water bottles and umbrellas, including for marketing purposes.
- Maddocks uses the cleaning services provided by the building management at each of our office sites. Responses to our Supplier Surveys acknowledge that cleaning services have an inherent risk of modern slavery as positions often have lower wages, involve manual labour and are frequently on a casual basis. Workers are also often from migrant, low socio-economic, or culturally or linguistically diverse backgrounds. We considered this risk in further detail during this reporting period (see Criterion 4).
- Maddocks procures coffee beans for its in-house café.

Geographic risks

Some countries may have higher risks of modern slavery. The Global Slavery Index 2023 of the Minderoo Foundation ranks countries based on the government response to modern slavery. Maddocks procures goods and services from the following countries, which may present a higher risk of modern slavery:

- **South Africa:** our outsource provider, providing back office support including word processing, debt recovery, billing support, property development law clerk support and s173 agreement support, is located in South Africa.
- **China and India:** Our laptop and IT accessory provider has manufacturing sites in China and India. We also source umbrellas, sports uniforms, and branded items such as pens and water bottles, which may be made in China.
- **The Philippines:** One of our IT support suppliers is located in the Philippines.

The Supplier Survey responses indicate that some of our suppliers have sub-suppliers located in high-risk jurisdictions including India, China, Vietnam, South Africa and the Philippines.

Entity risks

Some entities may have higher risks of modern slavery because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.

- Generally, labour hire suppliers are recognised as higher risk, given that the industry is largely unregulated and organisations often lack adequate policies and procedures to effectively manage employees.
- The labour hire sector also has heightened risks of worker exploitation through deceptive recruitment practices such as targeting individuals or groups from marginalised or disadvantaged communities and imposing recruitment costs on the workers themselves.
- We use labour hire suppliers to staff a small proportion of roles throughout the Firm including secretaries, legal personnel, IT and business administration support. In our previous reporting period, we considered our labour hire suppliers in more depth and confirm that we will continue to monitor the inherent risks associated with this sector for our current and future labour hire suppliers.



Criterion 4:

Actions we have taken

Section 16(1)(d) of the Modern Slavery Act requires reporting entities to describe the actions they have taken to assess and address the risks outlined in the previous section, including due diligence and remediation processes. This section addresses this criterion by detailing the steps taken by us during the reporting period to assess and address modern slavery risks as well as our agreed roadmap.

Actions taken in the reporting period

Maddocks recognises that developing and effecting an anti-modern slavery program is an ongoing journey of continuous improvement.

In our sixth reporting period, we have focused on undertaking the following new actions which are summarised below and explained further in **Actions taken relating to our operations** and **Actions taken relating to our supply chains**:

- **Continuing to provide training and education** to staff, which is fit for purpose, including the roll-out of a new mandatory online training module for all new starters providing context for what modern slavery looks like, both in the Australian context and globally;
- **Evaluating and assessing existing or potential suppliers** for the supply of goods and/or services to the Firm through the use of our **Risk Assessment Tool**. Our procurement team continues to use the tool during the procurement and vetting stage, to assess the level of modern slavery risks and to determine the appropriate level of due diligence to be conducted if the Firm were to onboard the supplier;
- **Engaging with our building management and their cleaning suppliers** through our newly created **Cleaning Supplier Surveys** to gain a better understanding of how the cleaning services supplier/s are engaged, the policies and procedures in place to monitor compliance and what oversight mechanisms are being used by both building management and the cleaning suppliers to mitigate these risks;
- **Providing access to our Site Visit Guide** which we designed to assist our staff in identifying and responding to modern slavery issues and concerns while conducting site visits and supplier audits. The Site Visit Guide is based on related guidance from the Commonwealth Guidance and the UN Guiding Principles on Business and Human Rights;
- **Continuing to implement specific modern slavery clauses** in supplier contracts in a prioritised risk-based way. We have focussed on suppliers which pose a higher risk (e.g., in the IT space) and our more substantial supply contracts where the Firm has a significant ongoing relationship, and therefore more leverage;
- **Continuing to socialise our Supplier Code of Conduct** with new and existing suppliers in a prioritised risk-based way as well as make our **Supplier Code of Conduct** available to the public on our public facing internet site;
- **Updating and promoting our external internet landing page** (on the Maddocks website) to enable current clients, potential clients and the wider public to see the impact the Firm is having to reduce the likelihood of modern slavery occurring within the Firm's operations and supply chain, as well as the Firm's commitment to its reporting obligations under the Modern Slavery Act;
- **Updating and promoting findings** from the latest Global Slavery Index and considering any implications on our modern slavery risks and actions. We will continue to monitor independent third-party commentary on modern slavery reporting, given the unique insight such commentary provides on the strengths and weaknesses of modern slavery reporting;



- **Continue monitoring and consider any new supplementary guidance** issued by the **Attorney General's Department** that, if implemented, could assist the firm in remaining in line with 'good practice' trends, where possible;
- **Continuing our increased due diligence** on charities sponsored by the Maddocks Foundation through the monitoring and reviewing of articles and news reports; and
- **Continuing our monitoring of the statutory review of the Modern Slavery Act**, including any related developments (such as the consultation by the Australian Government into the 25 recommendations they agreed to in full, part, or in principle made by Professor John McMillan, AO) and any other regulatory changes that may be imposed in future reporting periods.

Below is an overview of the steps we have taken during this reporting period to assess and address the risks in our operations and supply chains, and the existing policies and processes we have in place that can be used to facilitate further risk assessment, prevention and mitigation.

Actions taken relating to our operations

Management systems and controls

We continue to enjoy the benefit of a cross-functional Anti-Modern Slavery Project team (**Project Team**), to oversee the Firm's modern slavery response. The Project Team includes our Chief Operating Officer, Chief Information Officer, General Counsel, Facilities Manager, Director of People and Culture, and Director of Business Development, Communications & Marketing.

Modern Slavery on the Maddocks internet site

We launched our modern slavery page on the Maddocks website in our last reporting period, for clients, potential clients, external stakeholders and the wider public to be able to see the Firm's commitment to modern slavery and the steps we are taking as an organisation to minimise the Firm's exposure to modern slavery and its associated risks. The website page allows users to access:

- the Firm's latest Modern Slavery Statement;
- the Firm's previous modern slavery statements;
- the Firm's **Supplier Code of Conduct**; and
- additional information about the Firm's commitment to modern slavery.

We can confirm that there have been **147** page views during this reporting period, from 1 July 2024 until 30 June 2025.

Incident Response Framework

The purpose of establishing the Incident Response Framework was to outline a Firm wide procedure for reporting and responding to any actual or suspected modern slavery incidents. Upon becoming aware of an incident or potential incident within our supply chains, staff will be able to take appropriate actions to investigate and remediate any actual or suspected modern slavery with the aim of preventing re-occurrence. Hypothetical examples have been provided throughout the Incident Response Framework to assist staff when they are assessing a situation, as well as additional questions to prompt thought. Although there is no one size fits all approach when responding to modern slavery incidents, we have established six key steps for staff to take into consideration:

- Conducting preliminary assessment;
- Safeguarding;
- Reporting;
- Remediation (Suppliers);
- Remediation, rehabilitation and resolution for victims; and
- Review – learnings.

Not all of the steps above will be relevant to every incident, however they will assist as a practical framework for staff to follow. The Incident Response Framework also contains an incident log template. The template will allow staff to respond to the relevant categories listed above, and compile as much evidence and information as possible to assess the risks, and create a plan to mitigate the current risk and any future risks.

Although the Firm has assessed the risk of modern slavery in its operations and supply chains as remaining relatively low, it provides great comfort to our staff and the Firm that we have the right tools in place in the unlikely event of an incident.



Anti-Modern Slavery Policy

We have continued to raise awareness of Maddocks Anti-Modern Slavery Policy, which complements the firm's Code of Ethical Conduct and Procurement Policy. This Anti-Modern Slavery Policy sets out our approach to ethical sourcing and the prevention of worker exploitation – including modern slavery— within our own business operations and our broader supply chains. The policy explains:

- The concepts of modern slavery in a digestible way;
- The firm's commitment to improving our response to the risks of modern slavery;
- How to identify potential indicators of modern slavery and the risk factors such as geographic risk, high risk industries, and suspicious behaviours;
- Access to the firm's Incident Response Framework for staff to be able to report and respond to any actual or suspected modern slavery incidents.
- The obligation on Maddocks partners and staff to report actual or suspected modern slavery.

Related Policies

Maddocks' operations are governed by a formal Code of Ethical Conduct (**Ethical Code**). This Ethical Code is founded on one of the Firm's core values – Integrity. The Ethical Code sets out guidelines to ensure Maddocks conducts its business with the highest standard of integrity and in accordance with all applicable laws and regulations. The Ethical Code also includes processes for reporting unethical or illegal conduct. Our Ethical Code, Procurement Policy, and Anti-Modern Slavery Policy all include specific references and links to the Firm's **Supplier Code of Conduct**.

Employment practices

We have robust policies and procedures in place for recruitment and remuneration of staff, ensuring compliance with all applicable employment laws and regulations. For all new partners and staff, our onboarding processes includes verification of experience, qualifications, and rights to work in Australia. Staff in support roles, shared services, and graduates are covered by the *Legal Services Award*, which is reviewed annually by our People and Culture team to ensure compliance. Lawyers (not including graduates) have their salaries benchmarked against industry standards.

Maddocks charitable program

As outlined in our previous reporting periods, the Maddocks charitable program has been, and continues to be, identified as an area of higher risk, for modern slavery, in our operations. We have continued our due diligence processes for recipients under our charitable program by monitoring for news in the media and using a range of research platforms, including Westlaw and Lexis Advance, to identify any modern slavery risks and incidents connected with these recipients. During this reporting period, we reviewed **33** articles/news reports related to our grant recipients. We note that this is a significant drop in the number of articles reviewed compared with our last reporting period (152). However, every year the grant recipients are selected by the Firm's Board, which means the recipients are different and can vary in size and public presence therefore presenting different types of risks. We are pleased to report that no modern slavery incidents have been identified through the review of these articles/news reports or during this reporting period.

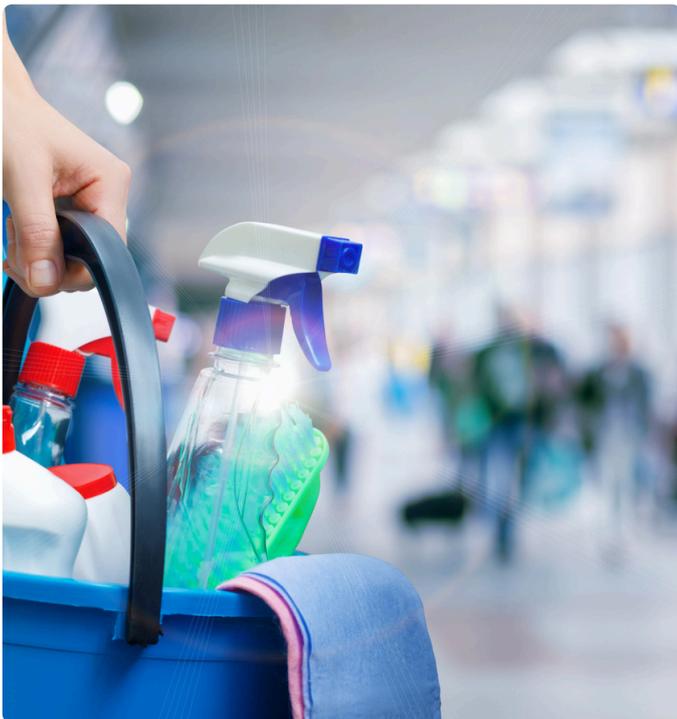
Our Maddocks Foundation Grant Application Forms (**Application Forms**) continue to include questions about modern slavery. Although none of the grant recipients from this reporting period are reporting entities under the Modern Slavery Act, it was positive to see that these questions included in the Application Forms prompted them to reflect on whether any modern slavery incidents had occurred within their organisations and what policies or procedures they had in place to safeguard their organisations from any relevant modern slavery risks.



The responses to the questions varied, however more than half of the organisations outlined that they had, or were willing to adopt, formal policies suitable for the industry in which they operate in e.g. volunteer policies outlining what to be aware of and actions that need to be taken should a modern slavery risk arise, codes of conduct and documenting recruitment requirements. It was pleasing to learn that one of the applicants takes a very pro-active approach to reducing the risk of modern slavery when it comes to the procuring of goods and/or services through the establishment of a procurement policy. The policy assists the organisation to ensure *“goods and services are acquired in a consistent, transparent and responsible manner”*. Another applicant identified that they will be adopting new systems to integrate comprehensive measures within their recruitment processes and update their charity policies to address the modern slavery risks within their organisation.

The insightful responses to the modern slavery questions in the Application Form along with the Firm’s ongoing monitoring of the recipients, assists in reducing the level of modern slavery risk the Firm and its operations are exposed to.

The Firm is pleased to report that there were no situations of modern slavery identified within any of the grant recipient organisations, in this reporting period.



Actions taken relating to our supply chains

Cleaning Supplier Surveys

As identified in all of our previous reporting periods, the Firm is aware that the cleaning industry poses a higher risk of modern slavery. This is due to the fact that many positions within this industry offer lower wages, the jobs involve manual labour and workers are frequently employed on a casual basis. Workers are also often from migrant, low socio-economic, or culturally or linguistically diverse backgrounds and experience wage theft and other forms of exploitation. The Cleaning Accountability Framework (CAF) stated that in CBD office buildings and retail spaces in major cities, international students and other temporary migrants account for up to 85% of cleaners on site.

Given the high risk of modern slavery and exploitative practices being used in the cleaning industry, the firm engaged with its building management and their cleaning suppliers with targeted **Cleaning Supplier Surveys**. The surveys aimed to gain a better understanding of how the cleaning supplier/s are engaged, the policies and procedures in place to monitor compliance and what oversight mechanisms are being used by both building management and the cleaning suppliers to mitigate these risks.

Questions were tailored to address these inherent risks, and were divided up into **eleven categories**, with **eight** of the **eleven** categories relating to the operations of the cleaning suppliers and three of the categories relating to the operations of building management. Each category focused on a different area of risk, including:

- Enforcement and compliance;
- Contractual arrangements building management have with the cleaning suppliers;
- Contractual arrangements the cleaning suppliers have with their workers;
- Entitlements, remuneration and benefits;
- Forced and bonded labour, harsh and inhumane treatment , child labour and working rights; and
- Whistleblowing.

The majority of the questions required a ‘Yes’ or ‘No’ response, and for all of the questions, we allowed space for the building management and the cleaning suppliers to provide further information should they wish to explain or expand on their responses.



Guidance for Supplier Site Visits and Audits

In the last reporting period, the Firm designed a Supplier Site Visit Guidance document (**Site Visit Guide**). The Site Visit Guide is structured around 5 Key Principles based on best practice guidance from the Commonwealth Government and the UN Guiding Principles on Business and Human Rights. The Site Visit Guide is intended for use by Maddocks staff when conducting supplier site visits, particular for higher risk suppliers, and to assist our staff in identifying modern slavery risks, or areas of concern. Importantly, the document contains practical guidance (supported by illustrative case studies) on what to do in the event that actual or suspected incidents of modern slavery are identified during the site visit, including clear escalation points at Maddocks. The guidance prioritises the health, safety and wellbeing of both Maddocks staff and of the supplier's workers. During this reporting period, there were no supplier site visits conducted.

In consultation with our facilities managers in all three offices (Melbourne, Sydney and Canberra), we sent the Cleaning Supplier Surveys to the relevant building management companies – each of our three offices are managed by different companies. The email to the building management companies provided an overview of why the Firm was seeking responses to the Cleaning Supplier Surveys and outlined our reporting obligations under the Modern Slavery Act.

We received comprehensive responses and accompanying documentation to the surveys from all **three (100%)** building management companies, which the firm will review in the next reporting period. We propose to evaluate the quality of the responses and assess whether there are any categories of the survey that require clarification or further information from either building management or the cleaning suppliers. The aim will be to identify whether the building management (and cleaning supplier's) employment procedures are fair, ethical and that modern slavery risks are proactively being mitigated. Upon reviewing the responses, we may request further information from the building management (and cleaning suppliers) and/or provide either of them with educational tools to assist them in identifying and addressing any potential or actual modern slavery risks associated with the cleaning services being provided and the cleaning industry more broadly in the future.

Risk Assessment Tool

As the firm continues to grow, so too does the need for additional suppliers and resources. It became apparent that the Firm would benefit from a more structured approach to vetting suppliers (both current and future) for modern slavery risk. In the last reporting period, the Firm developed a Modern Slavery Risk Assessment Tool (**Risk Tool**) to be used, predominantly by the procurement team, when looking to procure new suppliers.

The Risk Tool aims to assist staff to identify, at a very high level, whether there are any likely modern slavery risks and the level of due diligence that would be required if we were to enter into an agreement with the supplier for goods and/or services. The Risk Tool is divided into two phases:

- 1. Phase One (to assess the product/service risk and geographical risk)** aims to categorise the type of goods and/or services the supplier is providing and the countries from which they are procuring these goods and/or services; and
- 2. Phase Two (to determine the level of due diligence required)** uses the responses from Phase One to determine the level of risk associated with the goods and/or services and whether the Firm can proceed with the supplier with an appropriate level of due diligence (e.g. ongoing monitoring, questionnaires and/or educational tools).



Further to the work in the last reporting period, the Risk Tool was re-circulated to all Heads of Departments (including the Firm's Chief Information Officer, Chief Operating Officer, Director of People and Culture, Director of Business Development, Communications and Marketing and Head of Finance). This was important as there have been a number of new staff members join the Firm, particularly in the procurement team. This was an opportunity to remind staff about how the Risk Tool can be used, and how they can play a crucial role in identifying higher risk suppliers for products and/or services the Firm wishes to procure through our **two step phase**. The Heads of Department were asked to share the Risk Tool with relevant members of their team who are involved in supplier procurement. We have provided an example of how the Risk Tool was successfully used during this reporting period (see Case Study on page 18).

Supplier Code of Conduct

The Maddocks **Supplier Code of Conduct (Supplier Code)** continues to complement the Firm's Anti-Modern Slavery Policy, Code of Ethical Conduct, and Procurement Policy by articulating our expectations of suppliers in relation to modern slavery, as well as other ethical, human rights, labour, health and safety and environmental standards.

We continue to update the firm's internal register which contains a list of the suppliers who receive our Supplier Code throughout the reporting period. In this reporting period, **forty-one (41)** suppliers received and agreed to comply with our Supplier Code. This number is a significant increase on the last reporting period (FY23/24 was 16) due the growing number of contracts the firm is entering into for the supply of goods and services.

The Supplier Code continues to be a crucial step in the Firm's ethical procurement processes and the increase in numbers on last year's reporting period demonstrates the Firm's ongoing commitment to circulate the Supplier Code to as many of our suppliers as possible. The Supplier Code is also a key way for the Firm to continue raising awareness about modern slavery risks especially for our smaller suppliers who are not, themselves, reporting entities under the Modern Slavery Act and therefore may be less aware of the relevant issues.



Policies

Ethical procurement is a well-established principle in our procurement processes. Maddocks has a Procurement Policy, Code of Ethical Conduct and Environmental Policy, as well as our Risk Tool to assist with procurement. These policies require all procurement to be ethical and to comply with applicable laws and include processes for reporting unethical or illegal conduct through the use of our Incident Response Framework.

Supplier vetting and monitoring

Maddocks has identified a number of existing processes used to assess and monitor suppliers, which can be leveraged to assess and address modern slavery risk. For example:

- **Reference checking** for potential suppliers;
- **Completion of a 'request for information' questionnaire** for potential suppliers. We have incorporated specific modern slavery due diligence questions into our screening process for potential suppliers in IT and key procurement tenders during this reporting period;
- **Our Risk Tool**, which will be a vital tool in assisting the procurement team in vetting and monitoring potential suppliers in future reporting periods. The procurement team were provided with instructions and guidelines on how to use the Risk Tool during this reporting period.
- **To monitor existing suppliers**, Maddocks conducts site visits from time to time, including to overseas sites. During this reporting period, no site visits were conducted.

Modern slavery clauses in supplier contracts

Maddocks continues to include modern slavery clauses in new supplier contracts, as well as in any relevant renewal contracts in a prioritised risk-based manner. To remain consistent with the Commonwealth Government's recommendations, we continue to use the suite of developed clauses which are of tiered complexity and are issued according to the level of risk of modern slavery practices occurring in the performance of the contract.

The Firm has an internal contracts register which is continually updated to include a list of the contracts that include modern slavery clauses. This internal record allows the Firm to quantify the number of contracts entered into in each reporting period. During this reporting period, Maddocks entered into **sixty-one (61)** new contracts (or contract renewals) that included appropriate modern slavery clauses according to the level of risk occurring in the performance of the contracts. This is a significant increase on the last reporting period's numbers (29) and demonstrates the Firm's ongoing commitment to managing and mitigating modern slavery risks in its supply chain and educating its suppliers, regardless of whether they are reporting entities, about the associated risks.

We will continue to include these clauses in our supply contracts, both new and existing, to further educate our suppliers about modern slavery risk and mitigation, and to encourage suppliers to raise any concerns they may have if modern slavery incidents are suspected.

Training and education of staff

During the reporting period, we have:

- **Continued providing new starters with a mandatory online training module** for modern slavery as part of the induction training pack. This training module is interactive and requires staff to complete learning checks at the end of each module to test their understanding. The training module is based on the Australian modern slavery legislation and provides relatable and understandable examples of the types of modern slavery that occurs in Australia and also on a global scale. We have had **236** new starters, including legal staff, shared services and consultants, complete this modern slavery training module in this reporting period. Along with this updated training module, new starters must also review and acknowledge the Firm's Anti-Modern Slavery Policy.
- **Updated our modern slavery intranet page** as part of our continued efforts to educate our staff about modern slavery. The intranet page is a useful resource for all staff as it brings together all of the work the Firm is doing in this space in one place. Staff are able to navigate through the page easily to discover an overview of what modern slavery is, how modern slavery affects the Firm, and our legal reporting obligations. We have also included all of the Firm's past modern slavery statements and our related policies and procedures, including current articles regarding modern slavery in Australia. There are links to the Global Slavery Index, the Firm's training modules on modern slavery as well as a list of frequently asked questions. During this reporting period, the intranet page has had **222** interactions from staff. This is a large increase on the last reporting period, which is positive to see.





- **Published multiple articles in the Maddocks firmwide internal newsletter** as well as to the general public including:
 - our Modern Slavery Statement being published on the Australian Border Force register in the last reporting period;
 - a public Instagram and LinkedIn post regarding the publishing of our latest Modern Slavery Statement (with a link for viewers to access); and
 - a public article providing insights into developing policy or strategy that mitigates risk of modern slavery in the supply chain in the *Australian Legal Sector Alliance Member Sustainability Insight Report 2024* (published 4 December 2024). Further detail about this article can be seen in the Case Study (see page 19).
- **Continue to provide access to our Incident Response Framework** which sets out the Firm’s approach to reporting and responding to any actual or suspected modern slavery incidents. The Incident Response Framework also includes a step-by-step process of how to deal with the incident and log appropriate information to create a record for the Firm and an action plan to mitigate any further incidents from occurring.
- **Continued to work with our appointed ‘modern slavery compliance champions’** within the Firm – these include Partners and legal staff who, over the last six years, have been responsible for monitoring and being across developments in the modern slavery space, supporting the activities of our Anti-Modern Slavery Project team and generally helping to assist with our Modern Slavery Act compliance;
- **Monitored and reviewed updates and guidance from:**
 - the Australian Government, particularly their response on 2 December 2024, in relation to the 30 recommendations put forward by the independent review of the Modern Slavery Act conducted by Professor John McMillian, AO in 2023. The Australian Government agreed with, in full, part or in principle, to 25 of the 30 recommendations, made by Professor John McMillian, AO. The purpose of the recommendations made were to put forward meaningful ways the Australian Government can strengthen the Modern Slavery Act. Five of the recommendations were simply noted by the Australian Government. Consultation by the Australian Government with businesses and key stakeholders is currently under way in relation to the recommendations, and we intend to continue monitoring any regulatory developments;
 - the Australian Anti-Slavery Commissioner’s website and the Anti-Slavery Commissioner himself, Chris Evans;
 - the NSW Anti-Slavery Commissioner. We note that this does not apply to Maddocks but impacts many of the firm’s clients;
 - independent reports into proposed recommendations for amendments to the Modern Slavery Act;
 to inform our approach and in our commitment to continuous improvement

Benchmarking exercise

Maddocks continues to monitor the modern slavery statements of other law firms, to better understand how others in the legal profession are approaching modern slavery risk, and to inform the continuous improvement of our own compliance plan.

Case Study:

Use of the Risk Tool by the procurement team

During this reporting period, the facilities team in the Melbourne office used the Risk Tool to assess a new coffee bean supplier, where the coffee beans will be used in our onsite Café, Barcode.

After undertaking the initial review of the goods being provided (coffee beans) and the geographical locations the goods (coffee beans) are being sourced from, based on the 2023 Global Slavery Index, we established that the coffee bean supplier was a **medium risk** as assessed using the Risk Tool.

This risk rating required further due diligence of the supplier, and a decision was made to proceed with the supplier given that they have adequate measures in place to identify, address and mitigate modern slavery risks in their supply chains. We had very positive feedback from the use of the Risk Tool in this procurement process and the user provided the following statement:

"We have a lot to remember when it comes to the procurement of new goods and services at the firm, however the Risk Tool was able to simplify the process in two easy steps. Once I determined what the risk rating was, and the level of due diligence required, we were able to ask the supplier the necessary questions to address any risks identified and mitigate the firm's overall risks."

We will continue to circulate the Risk Tool to the procurement team in the next reporting period.



Case Study:

Article published in the Australian Legal Sector Alliance Sustainability Report 2024

The Australian Legal Sector Alliance (AusLSA) is an industry-led association working collaboratively to promote best practice sustainability commitments and performance across the legal sector, in which Maddocks is a founding member. The AusLSA publishes an annual sustainability report that showcases different law firms and their commitment to sustainable and inclusive workplaces, community support, environmental conservation and responsible governance.

During this reporting period, Maddocks was asked to publish an article for the annual AusLSA sustainability report on "[Addressing modern slavery in the supply chain](#)" (pictured).

The article outlines the challenges Maddocks has faced when developing and implementing strategies to mitigate modern slavery risks. Further, the article outlines some key solutions and action items that Maddocks has implemented since the reporting obligations commenced which could assist other law firms or professional organisations to consider for their organisations to further their commitment to mitigating modern slavery risks in their own supply chains. These include:

- Supplier Mapping;
- A Risk Assessment Tool;
- Supplier Surveys and Follow ups;
- **Supplier Code of Conduct;**
- Contractual clauses in supplier contracts;
- Site Visits

Overall, this article aims to provide recommendations to other law firms/professional services based on Maddocks' experience with implementing, educating and mitigating modern slavery risks within our organisation, with a particular focus on our supply chain.

We believe that by sharing knowledge and experience with other organisations, we can make a significant difference to the way firms operate and their perceptions of modern slavery and the associated risks.

CASE STUDY:

Addressing modern slavery in the supply chain

Insights into developing a policy or strategy that mitigates risk of modern slavery in the supply chain

MADDOCKS

Stuart Napthali
Partner

Victoria Graham
Special Counsel

Under the Modern Slavery Act 2018 (Cth), law firms are required to identify and address the risk of modern slavery in their supply chains. This responsibility goes beyond compliance—it plays a critical role in collectively combating modern slavery, as well as increasing corporate accountability and transparency. Maddocks has implemented a proactive and risk-based approach to ensure that the firm's supply chain procurement practices align with these obligations and contribute meaningfully to the fight against modern slavery.

CHALLENGES

Firms often face challenges when developing and implementing strategies to mitigate modern slavery risks, particularly with limited time and resources. The complexity of mapping supply chains and assessing risks can be daunting. However, by adopting a risk-based approach, leveraging established methodologies, and tailoring engagement with suppliers based on the relationship's nature, these challenges can be effectively managed. Maddocks has developed a series of measures that address these challenges and enhance the firm's capacity to manage modern slavery risks.

SOLUTIONS AND ACTIONS

Maddocks has implemented several processes to mitigate modern slavery risks in its supply chain, including:

Supplier Mapping: A thorough mapping exercise involving key stakeholders across the firm to gain a deeper understanding of the supply chain and identify key suppliers.

Risk Assessment Tool: Developed based on the Commonwealth Government's guidance and Global Slavery Index statistics, the Risk Assessment Tool helps streamline the evaluation of suppliers. It assesses each supplier based on four key risk factors: Sector and Industry Risks, Product and Services Risks, Geographic Risks, and Entity Risks. The assigned risk level determines the extent of due diligence required for each supplier.

Supplier Surveys and Follow-ups: Tailored surveys and follow-ups are used to gain deeper insights into each supplier's specific risk profile and their efforts to mitigate modern slavery risks.

Supplier Code of Conduct: Maddocks published a Supplier Code of Conduct, outlining its expectations of suppliers regarding modern slavery and other ethical standards, including human rights, labour, health, safety, and environmental requirements.

Contractual Clauses: Tailored contractual clauses, based on Australian Government model clauses, are included in supplier contracts to clarify expectations around modern slavery risk management. These are implemented based on a prioritised, risk-based approach.

Site Visit: A physical site visit was conducted with a key third-party service provider in South Africa, identified as a high-priority due to geographic risks. The visit included an inspection of the premises, a review of relevant policies, and staff interviews, ensuring that the level of engagement matched the supplier's risk profile and the strength of the firm's relationship with them.

RECOMMENDATIONS

Based on Maddocks' experience, the following steps are recommended for firms seeking to address modern slavery risks in their supply chains:

- **Map Your Supply Chain:** Invest time in mapping your supply chain to identify high-risk areas, which will provide a strong foundation for ongoing efforts.
- **Use Established Resources:** Leverage publicly available, reputable resources and global standards when developing policies and strategies.
- **Thorough Procurement Processes:** Implement robust procurement processes to assess both new and existing suppliers.
- **Tailor Supplier Engagement:** Adjust the level of engagement with suppliers based on the risk they present and the nature of the firm's relationship with them.

Criterion 5:

The effectiveness of our actions

Section 16(1)(e) of the Modern Slavery Act requires modern slavery statements to describe how the reporting entity assesses the effectiveness of the actions being taken to assess and address modern slavery risks. This section addresses this criterion by outlining the steps taken by us during the reporting period to review the effectiveness of our actions to assess and address modern slavery risks.

With the Firm making a commitment of continuous improvement to monitor progress of our own modern slavery project through key performance indicators, the Firm has both quantitative and qualitative data to demonstrate our progress, which allows for greater oversight and mapping for future reporting periods.

Quantitative Assessment of our actions

Modern Slavery KPI's		
Key Objectives	Key performance Indicator	Summary of Performance
<p>Employee training and awareness Our online training module aims to provide all new starters to the Firm with an overview of modern slavery in both the Australian and global context. This training module is interactive and requires staff to complete 'learning checks' and/or case studies at the end of each module to test their understanding.</p>	<p>The number of staff who have completed the online training module regarding Modern Slavery.</p>	<ul style="list-style-type: none"> All new starters are required to complete a mandatory online Modern Slavery module designed to outline the Australian legislative requirements and context of modern slavery. 236 of our new starters have now completed this mandatory online module in this reporting period. All new starters are required to read and confirm they have understood the Firm's Anti Modern Slavery Policy as part of the Modern Slavery induction training program.
<p>Modern Slavery clauses in our supplier contracts We continue to use the suite of developed clauses which are of tiered complexity and are issued according to the level of risk of modern slavery practices occurring in the performance of the contract.</p>	<p>The number of supplier contracts incorporating modern slavery clauses</p>	<ul style="list-style-type: none"> During this reporting period, Maddocks entered into 61 new contracts (or contract renewals) that included appropriate modern slavery clauses according to the level of risk occurring in the performance of the contracts.
<p>Acknowledgement and Compliance with our Supplier Code of Conduct We continue to provide our new and existing suppliers with our Supplier Code of Conduct. The Supplier Code sets out the minimum ethical standards and businesses practices we expect from our Suppliers including raising awareness of modern slavery and providing mechanisms for addressing any potential or perceived modern slavery risks.</p>	<p>The number of supplier contracts requiring compliance with our Supplier Code of Conduct.</p>	<ul style="list-style-type: none"> The Firm has an established internal register listing the names of the suppliers who have received our Supplier Code. During this reporting period, 41 suppliers have received and complied with our Supplier Code.



Modern Slavery KPI's		
Key Objectives	Key performance Indicator	Summary of Performance
<p>Our modern slavery intranet page As part of our continued efforts to educate our staff about modern slavery, this intranet page is a useful resource for all staff to have access to as it brings together all of the work the Firm is doing in this space in one place. Staff will be able to navigate through the page easily to discover an overview of what modern slavery is on a global scale, what it looks like in the Australian context and access all of our related policies , procedures and frequently asked questions.</p>	The number of interactions on the intranet page.	<ul style="list-style-type: none"> • During this reporting period we had 222 interactions from staff.
<p>Our modern slavery internet page The establishment of our Maddocks modern slavery internet site allows clients, potential clients, external stakeholders and the wider public to be able to see the Firm's commitment to modern slavery and the steps we are taking as an organisation to minimise the Firm's exposure to modern slavery and its associated risks.</p>	The number of interactions on the internet page.	<ul style="list-style-type: none"> • During this reporting period, there were 147 interactions with our internet page.
<p>Reporting procedures under our Supplier Code of Conduct Monitoring the number of modern slavery concerns raised under our reporting procedures outlined in our Supplier Code of Conduct.</p>	The number of concerns raised under our reporting procedures.	<ul style="list-style-type: none"> • There have been no issues or concerns raised by any of our staff, Suppliers or third parties through our reporting procedures.
<p>Monitoring of Maddocks Foundation Grant Recipients As part of our efforts to reduce the risks associated with our Maddocks Foundation through its grant recipients, we set up notification alerts any time articles/news reports were published on the grant recipients.</p>	The number of articles/news reports reviewed.	<ul style="list-style-type: none"> • The Firm established a register listing the names of the organisations who have received grants through the Maddocks Foundation. • During this reporting period, we reviewed 33 articles/news reports. • There have been no issues or concerns identified regarding modern slavery through this review process.
<p>Annual compliance plan To ensure we are tracking in a direction of continual improvement, we monitor our compliance against our annual compliance plan.</p>	The percentage of completion of our annual compliance plan.	<ul style="list-style-type: none"> • We successfully completed 100% of our planned key priorities in this reporting period (as set out in our previous modern slavery statement).

Maddocks intends to periodically review these key performance indicators to determine whether they continue to represent appropriate criteria for measuring the effectiveness of Maddocks efforts to assess and address modern slavery risks.



Qualitative Assessment of our actions

During this reporting period, our procurement team used our Risk Tool when looking for a new supplier to provide coffee beans to the Melbourne Office's internal café, Barcode. A useful indicator to the Firm demonstrating that this Risk Tool is beneficial is through positive feedback received from the procurement team staff member.

The following feedback was provided by a staff member who assists with the procurement of goods and services at Maddocks in relation to their use of the Firm's Risk Tool:

“

'We have a lot to remember when it comes to the procurement of new goods and services at the firm, however the Risk Tool was able to simplify the process in two easy steps. Once I determined what the risk rating was, and the level of due diligence required, we were able to ask the supplier the necessary questions to address any risks identified and mitigate the firm's overall risks'.

Criterion 6:

Our consultation process

Section 16(1)(f) of the Modern Slavery Act requires reporting entities to describe the process of consultation with any entities that the reporting entity owns or controls. To address this criterion, this section outlines how Maddocks prepared this Statement including consultations with Maloch Pty Ltd.

Maddocks wholly owns Maloch Pty Ltd, which operates as Maddocks' service company. As Maloch Pty Ltd is integrally connected to Maddocks' business, the operations and supply chains of Maloch Pty Ltd have been included in our modern slavery response plan.

Accordingly, any references in this Statement to Maddocks' operations and supply chains include the operations and supply chain of Maloch Pty Ltd.

For the avoidance of doubt, this Statement is a single modern slavery statement by Maddocks, and not a joint statement. Maloch Pty Ltd is not a reporting entity for the purposes of the Modern Slavery Act.

Given Maloch Pty Ltd is integrally connected to Maddocks, including sharing the same key staff across procurement, shared governance and risk assessment structure, it was not necessary to have a formal consultation process.



Criterion 7:

Provide any other relevant information

Section 16(1)(g) of the Modern Slavery Act allows for reporting entities to include any other relevant information that the reporting entity thinks is relevant. Based on Government guidance we think it is relevant to foreshadow the impacts of our upcoming premises relocation projects as well as how Maddocks has been contributing to the discussion of modern slavery more broadly.

Maddocks thought leadership

Maddocks has taken a keen interest in the prevention of modern slavery, not just in terms of the Firm's own compliance, but more broadly, in terms of how we can assist others in their stance against slavery. We care about human rights and seek to make a practical contribution to raise collective awareness about this important issue. We are committed to educating our clients in this area.

We have a significant anti-modern slavery practice servicing a number of clients. During the reporting period, we published several new resources and articles regarding modern slavery compliance and resources from previous reporting periods remain available on our website.

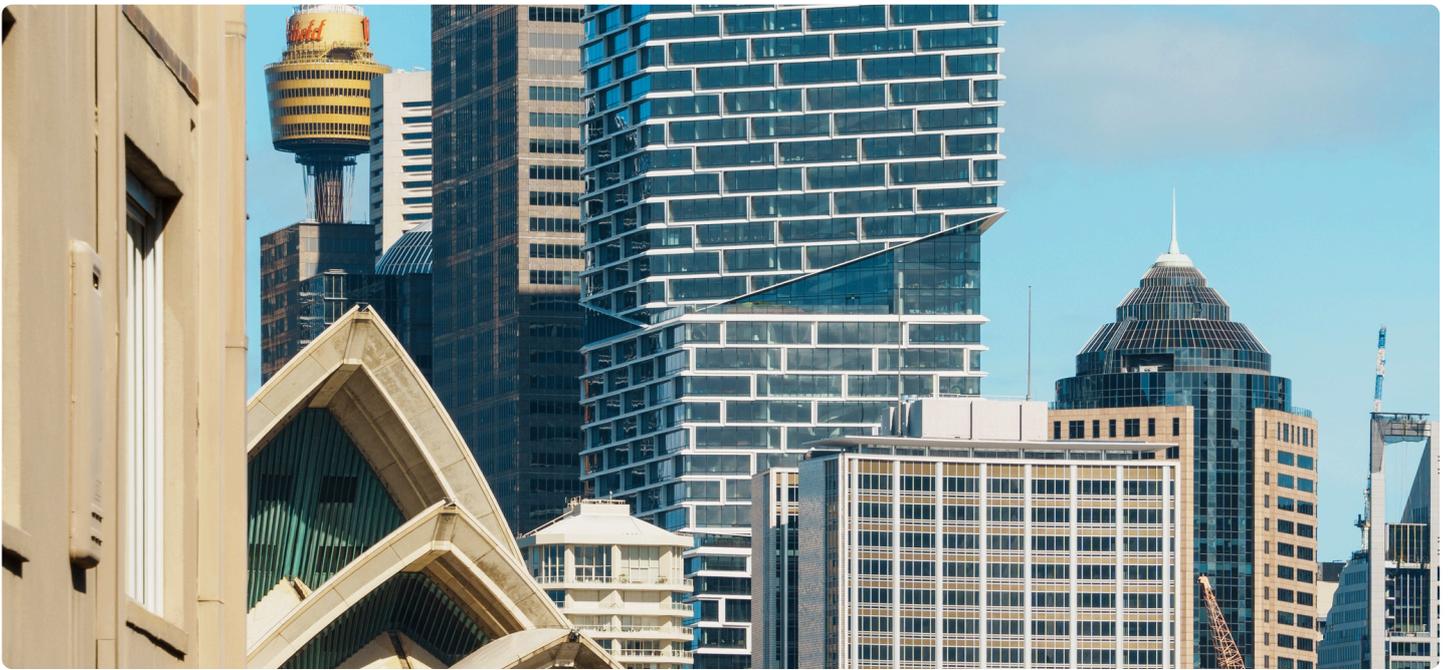
The NSW Regime

Maddocks continues to acknowledge that the *Modern Slavery Act 2018 (NSW)* (**NSW Act**) is in force making New South Wales the first state to have a standalone legislation tackling modern slavery.

While Maddocks is not regulated by the NSW Act, we appreciate the NSW Act impacts many of our clients including NSW government agencies and NSW local councils. During the reporting period we have reviewed and monitored the guidance and resources published by the NSW Government, not only to advise our clients but to assist to develop our understanding of modern slavery issues. We have also been monitoring updates from NSW's new Anti-slavery Commissioner, Dr James Cockayne, including his office's release of the Guidance on Reasonable Steps.

We further appreciate that the NSW Act is more than a reporting requirement and requires NSW Government agencies and local councils to take reasonable steps to ensure that the goods and services they procure are not the product of modern slavery. We note that Maddocks is a 'supplier' to NSW Government agencies and local councils and consider that the significant investment we have made into our anti-modern slavery compliance for the purpose of the Modern Slavery Act will be valuable as we continue to service our NSW Government clients.





Sydney and Canberra Office projects

During this reporting period, Maddocks commenced:

- an office expansion of more floor/office space in the Canberra office and
- preparations for a move from the existing Sydney premises to a new office location in Sydney.

The changes to our premises in both Sydney and Canberra are significant developments for our business, and require the procurement of new vendors and suppliers of a range of goods and services, including for the fit out of the buildings/space and also for the procurement of new equipment and supplies. As these changes are currently being planned, and will take effect in our next reporting period, Maddocks will address any modern slavery risks regarding these new vendors and suppliers in our next Statement.

Australian Government Anti-Slavery Commissioner

During this reporting period, the Australian Government appointed Chris Evans as the inaugural Australian Anti-Slavery Commissioner (**AS Commissioner**) on 7 November 2024. Since the appointment, there have been a number of important new guidance and modern slavery updates published for the public and industry to access. These publications and guidance include the AS Commissioner's Letter on compliance with the Modern Slavery Act, which has been issued to major law firms, advisory firms, and industry bodies regarding business compliance with the Modern Slavery Act.

The AS Commissioner is seeking the support of law firms, in ensuring that their clients, who are required to report under Section 13 and 14 of the Modern Slavery Act, are meeting their obligations.

As the Letter was published in July 2025, Maddocks will review the Letter along with any other guidance published by the AS Commissioner to inform our response and provide further detail of the review in the next reporting period. We also intend to communicate with our clients in a manner consistent with the AS Commissioner's Letter.



What is next?

Maddocks is committed to continuing improvement in our stance against modern slavery. We are looking forward to building on the work described above. Our key priorities for the next reporting period are:



Undertake an assessment of our new vendors and suppliers for Sydney and Canberra office projects: We will undertake due diligence assessments on our new Sydney Office vendors and suppliers using a risk-based approach as the firm moves from its existing office location to a new building and office space. We will undertake similar due diligence assessments on our vendors and suppliers for the newly acquired space as part of the existing Canberra office location. We anticipate that we will engage with the vendors and supplier and request that they complete the firm's Modern Slavery Supplier surveys. The aim will be to identify whether the new vendors and suppliers are proactively mitigating any modern slavery risks within their organisations and their supply chains.



Continued internal training: We will continue to deliver our mandatory online e-module training for all new starters.



Continued education of our staff: We will continue to keep our staff updated of our own Modern Slavery actions and initiatives, including of our new Modern Slavery Statement.



Engaging with our cleaning services suppliers: We intend to review and evaluate the responses we received from our Cleaning Supplier Surveys in this reporting period. The aim will be to identify whether the building management (and cleaning suppliers) employment procedures are fair, ethical and that they are proactively mitigating any modern slavery risks. Where responses suggest areas of concern, we will further engage with building management (and the cleaning suppliers) with a view to educate and assist with improving both our anti-modern slavery processes in our supply chains and theirs, as we have previously undertaken with our other suppliers in our supply chain.



Updating our key supplier list: Using previous information collated from conducting internal surveys of key stakeholders to gather the information necessary to map our supply chain, we intend to identify any new or existing suppliers that the Firm uses and assess whether we require the suppliers to respond to our supplier surveys.





Continuing to implement specific modern slavery clauses in key supplier contracts, in a prioritised risk-based way.



Continuing to circulate our Supplier Code of Conduct to key existing suppliers and any new suppliers, in a prioritised risk-based way.



Continue to review articles and news alerts for Maddocks Foundation grant recipients to ensure that the higher risk posed is mitigated through constant monitoring and due diligence.



Monitoring amendments to the Modern Slavery Act and guidance by the AS Commissioner: We will continue to monitor any changes the Australian Government intends to make regarding the Modern Slavery Act and any guidance released by the AS Commissioner. We intend to take appropriate steps to comply with any additional reporting requirements and obligations imposed on Maddocks as a reporting entity under the Modern Slavery Act.



Reviewing the Australian Anti-Slavery Commissioner's Letter to Law Firms: We aim to review the letter published by the Commissioner on 17 July 2025 and undertake any action items recommended by the Commissioner for Law Firms. Further, we anticipate publishing an article in relation to the Commissioner's Letter with the aim of raising awareness of modern slavery risks in the legal profession in which we operate.



Continuing to review findings reported by independent third-parties on modern slavery reporting: We will continue to monitor independent third-party reports on modern slavery reporting given the unique insight these reports give on the strengths and weaknesses of modern slavery reporting.



Update our modern slavery related intranet and internet pages to ensure they include references and links to the latest Statements, and any relevant articles/news alerts regarding modern slavery.

Approval and signing

Section 13(2) of the Modern Slavery Act requires statements for single reporting entities to be approved by the principal governing body of the entity and signed by a responsible member of the entity. The Commonwealth Guidance states: "It is best practice that the head of the principal governing body signs the statement (for those entities where the responsible member is a member of the principal governing body). For example, if the reporting entity has a board, then the chair of the board or the Chief Executive (if they are a member of the board) should sign your statement." Accordingly, this section outlines how our Statement has been approved by our Board and signed by our Chairman of the Board.

In accordance with Section 13(2) of the Modern Slavery Act, this Statement was approved by the Board of Maddocks (ABN 63 478 951 337) on **24 November 2025**.

The Board is the principal governing body of Maddocks for the purposes of approving this Statement.

This Board has authorised Mark Henry, Partner and Chairman of the Board to sign this Statement.



.....
Signature

Mark Henry, Partner and Chairman of the Board
Maddocks, an Australian partnership

24 November 2025

.....
Date

Statement Annexure:

Mandatory criteria

Principal Governing Body Approval

This Modern Slavery Statement was approved by the principal governing body of Maddocks (ABN 63 478 951 337) as defined by the *Modern Slavery Act 2018* (Cth) (the Act) on 24 November 2025

Signature of Responsible Member

This Modern Slavery Statement is signed by a responsible member of as defined by the Act:



Mark Henry,
Partner and Chairman of the Board
Maddocks, an Australian partnership

Mandatory Criteria

The table below sets out the page numbers of our Statement that address each of the mandatory criteria in section 16 of the Modern Slavery Act:

Mandatory Criteria	Page number/s
a) Identify the reporting entity	Page 5
b) Describe the reporting entity's structure, operations and supply chains.	Page 6
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Pages 7 - 9
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Pages 10 - 19
e) Describe how the reporting entity assesses the effectiveness of these actions	Pages 20 - 22
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Page 23
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant	Pages 24 - 25





Maddocks

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