

# Modern Slavery Statement 2021

22 December 2021

## Introduction

This Modern Slavery Statement has been prepared by Dentons Australia Limited in accordance with the Modern Slavery Act 2018 requirements. This statement relates to our activities during the 2021 financial year, from July 1 2020 to June 30 2021 and was approved by the Board of Directors on 22<sup>nd</sup> December 2021.

The purpose of this statement is to outline Dentons' approach to ensuring that our organisation has in place the appropriate policies, processes and frameworks to identify, assess and mitigate modern slavery risks in our business operations and supply chain.

We recognise the suffering which modern slavery causes and that it has no place in today's world. In an increasingly global marketplace, we recognise that all businesses have a responsibility to understand whether modern slavery is taking place within their supply chains and take any necessary actions to remove unlawful or unethical practices. This is a responsibility we take seriously.

Dentons is committed to the highest ethical business standards and expects the same of our business partners and supply chain. Modern slavery in any form will not be tolerated in our business or those that we do business with.

## Our business

Dentons Australia Limited (Dentons) is an incorporated legal practice providing legal and professional services to businesses and individuals in Australia and Papua New Guinea since 2016 and in New Zealand since 2018.

Dentons has offices in Sydney, Melbourne, Brisbane, Adelaide and Perth, as well as Port Moresby, Papua New Guinea, and Auckland, New Zealand.

Considering the nature of our professional services and the requirement that our employees must adhere to professional conduct standards in the jurisdictions we operate, we consider that the risk of modern slavery in our local operations is very low.

## Our supply chain

Dentons supply chain consists of those entities that support the provision of our legal and professional services across the country.

Our supply chain includes leases for the properties we occupy, catering and cleaning services, some outsourced business process services, recruitment and employment agencies and the purchase of goods including office furniture and supplies, IT software and hardware. The vast majority of goods and services sourced by Dentons are provided by entities within Australia however we acknowledge that some local suppliers may also have international supply partners. As this may increase the risk of modern slavery we are dedicated to identifying the origin of these goods and services.

### Our policies and procedures

Our commitment to ethical and legally compliant business practices has seen Dentons implement a range of policies and procedures designed to mitigate our exposure to modern slavery and human rights risks. Our approach begins with our employment practices, sourcing the highest calibre of candidates who undertake a comprehensive onboarding program that covers the high expectations we have for business practices within the organisation.

Our internal policies include those relating to ethical work practices, procurement and supplier due diligence, social impact, whistle-blower protections and supplier code of conduct. All policies are reviewed and updated at a minimum on an annual basis.

### Assessment of modern slavery risks

Dentons has undertaken a risk assessment process to understand our exposure to modern slavery risks. This process was designed to assist our organisation to develop strategies in order to mitigate current and future risks. The assessment took into account the primary modern slavery risk indicators including the goods and services supplied, high risk sectors or industries, geographic and entity-specific risks.

As a result of this initial assessment activity we have undertaken further consultation with our suppliers, tailored to the level of risk they represent. Those that present a higher level of risk will be required to complete a modern slavery questionnaire with the aim of gaining further insight into the second or subsequent tiers of our supply chain. Those who have been identified as lower risk will be informed of our commitment to the eradication of modern slavery and will be provided with opportunities for further engagement.

### Our actions

Looking towards the future we are improving our supplier due diligence practices through a more comprehensive supplier onboarding process that captures and assesses relevant organisational information. This information capture process will also be rolled out over time to the balance of our existing suppliers, allowing us to build a comprehensive risk profile across our supply chain. Standard contractual terms will also be developed that will provide a baseline for our future supplier engagements. A new Procurement Policy has been developed and implemented during over the next 12 months.

Educating our employees via internal training modules and also our suppliers through regular communication is a priority for Dentons and will further entrench the program into the culture of our organisation and those we work with. These education and communication mechanisms will allow Dentons to proactively manage any actual or emerging rights risks in a coordinated way with our suppliers. We have developed a training module for staff to be accessed on our internal online training platform and have made this training compulsory for all existing staff and through our induction program for new staff from June 2021. Training of the Dentons Board around the Modern Slavery risks and reporting requirements has been undertaken during 2021.

Dentons has developed a Modern Slavery Policy that provides a guideline for our complaints, grievances and remediation processes to ensure that we respond appropriately to any perceived, actual or emerging modern slavery risks.

## Measuring our effectiveness

With the introduction of our enhanced procurement and supplier due diligence process Dentons will be able to track the progress of our modern slavery program via the engagement of our suppliers, the number and timeliness of responses to our queries and feedback on our supplier code of conduct.

Further, we can measure our program's effectiveness through our employee's completion rate of training modules as well as their ability to confidently challenge and educate our suppliers.

## Consultation within our group

All entities owned or controlled by Dentons Australia Limited have been included in our risk based approach to the identification, assessment and mitigation of modern slavery risks. They have been made aware of the actions they need to take and will be developing their frameworks, policies and procedures in line with the emerging Australian and international legislation in this space.

## Approval



Doug Stipanicev

**Australasia Region CEO**

Dentons Australia Limited