

# Modern Slavery Statement

FINANCIAL YEAR 2024/25





Barry Nilsson (BN) is committed to upholding the highest standards of ethics and integrity in all aspects of our business. We believe that how we achieve our outcomes is as important as the outcomes themselves, and central to our values is a strong commitment to respecting human rights. We do not accept any form of modern slavery within our operations or supply chain, and our actions are guided by internationally recognised principles to ensure fairness, transparency, and accountability.

Modern slavery remains a complex and pervasive global human rights issue, affecting both governments and businesses. It includes exploitative practices such as debt bondage, servitude, child labour, forced labour, and human trafficking. With over 40 million people estimated to be victims worldwide, addressing modern slavery is an urgent and shared responsibility. As a reporting entity under the *Modern Slavery Act*

2018 (Cth), we fully embrace our responsibility to combat this issue and recognise the vital role organisations like ours play in preventing worker exploitation and protecting vulnerable individuals.

We are pleased to report that no instances of modern slavery have been identified within our operations or supply chain during the reporting period.

Nevertheless, we remain focused on strengthening our systems and controls to proactively prevent and address modern slavery risks, ensuring our commitment to ethical business practices is upheld now and into the future.

## Reporting entity

BN Law Limited, trading as Barry Nilsson Lawyers (ABN 22 621 026 864), is a single reporting entity under the *Modern Slavery Act 2018* (Cth). This is BN's second Modern Slavery Statement and covers the reporting year 1 July 2024 to 30 June 2025.

# Structure, operations & supply chain

BN is an Australian unlisted public company limited by shares, operating a legal services business. We employ approximately 450 lawyers, business services, and administrative professionals, with offices in Brisbane, Sydney, Melbourne, Hobart, Adelaide and Perth.

Our predominantly Australian supply chain supports the delivery of legal services through the provision of:

- **Offices:** Leased office spaces and fit outs.
- **Technology:** Hardware, software and equipment such as laptops.
- **Business Support Services:** Telecommunication and accounting services and office related products such as stationery.
- **Travel & Hospitality:** Flights, accommodation and restaurants.

## Modern slavery risk

No actual or suspected cases of modern slavery were identified over the reporting period in our operations or supply chains.

Our overall risk is assessed as relatively low, reflecting the nature of our professional services operations, the predominantly Australian profile of our supply chain, and the robust controls and policies we have in place. We continually review and strengthen these controls to ensure that any potential risks are proactively identified and managed.

### Operations

BN's operational risk is considered low due to our engagement of professional and highly skilled employees, the use of formal employment contracts, and robust policies and practices that support employees in raising workplace concerns. We are committed to full compliance with all applicable laws relating to recruitment, engagement, and employment, and ensure our people are paid in accordance with relevant legal industry awards. Our compliance is further supported by annual external audits and industry benchmarking of salaries.

### Supply chain

We recognise that supply chains can present risks related to modern slavery, and we are proactive in identifying and mitigating these risks. We place an emphasis on value rather than price alone, and we do

not make any demands which may lead suppliers to violating human rights, including modern slavery.

### Risk assessment

BN's supply chain was assessed using Fair Supply Analytics' modern slavery risk intelligence platform, which provides a comprehensive, value chain-wide assessment. This platform leverages global slavery prevalence data sets and advanced supply chain mapping to evaluate risk at multiple levels. Each supplier is assessed based on the geographical location, industry, and sector in which they operate, as well as their relative economic value to BN. Importantly, our risk mapping extends to Tier 10 suppliers, giving us deep visibility and enabling proactive identification and management of modern slavery risks throughout our entire supply chain.

### Risk ratings

The risk assessment was conducted across all Tier 1 suppliers for the 2024–2025 financial year, excluding legal creditors. A total of 416 suppliers were assessed using Fair Supply Analytics' modern slavery risk intelligence platform. All our suppliers were rated as low (88%) or low-moderate (12%) risk. No suppliers were assessed as moderate, moderate-high, or high risk.

All suppliers to Tier 10 also remain within the low or low-moderate risk categories. This deep level of transparency enables us to proactively monitor and address potential risks, ensuring that our supply chain remains aligned with our commitment to ethical sourcing and the prevention of modern slavery.

### Our supplier risk profile FY25



0% high risk suppliers used.



0% moderate-high risk and moderate risk suppliers used.



12% low-moderate risk and 88% low risk suppliers used.

## Geographical risk

With 99% of our supply chain by economic value located in Australia, our overall geographical exposure to modern slavery risk is significantly reduced.

The most recent Global Slavery Index cites Australia as among the countries with the lowest prevalence of modern slavery, with an estimated 1.6 victims per 1,000 people and a very low vulnerability ranking (155 out of 160, where a higher rank indicates less vulnerability). Australia's government response is considered strong, with robust legislation, enforcement, and victim support measures in place.

Other countries represented in our supply chain, such as France, Singapore, the United States, and the United Kingdom, also have low to moderate prevalence and vulnerability scores, and are recognised for their active government responses to modern slavery risks.

## Industry and sector risks

The highest industry and sector risks within our supply chain are construction, business services, and hotel and restaurant sectors. These sectors are globally recognised for elevated exposure to exploitative labour practices due to factors such as complex subcontracting arrangements, reliance on low-skilled and migrant labour, and limited transparency in downstream supply chains.

Our highest risk category for our supply chain was 'moderate-low' which was exclusively comprised of suppliers in the hotel and restaurant sector. These suppliers collectively accounted for 21% of our overall sector risk profile. Despite their elevated inherent risk, our engagement with these suppliers is typically limited to infrequent, ad hoc transactions of immaterial value. As such, our ability to influence their internal practices is constrained.

Accordingly, we prioritise deeper engagement with suppliers where we have greater leverage and where the relationship is material to our operations. This includes our core operational suppliers, which, although rated as 'low risk', are critical to our service delivery. Notably, this included fit-out and IT suppliers which represented 42% of our supply chain risk as a result of the elevated inherent industry risk. Given the materiality of these relationships, we undertook a detailed assessment of their modern slavery practices. The outcome was a rating of 'advanced', which is the highest rating available on the Fair Supply Analytics' platform, demonstrating strong governance, transparency, and proactive risk mitigation measures.

This targeted approach ensures that our modern slavery risk management efforts are proportionate, evidence-based, and focused on areas where we can drive meaningful impact.

## Actions to assess risk

### Due diligence

BN's modern slavery risk minimisation strategy is guided by international human rights frameworks, including the UN Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, ILO Fundamental Conventions, and the Convention on the Rights of the Child. It has been developed in consultation with expert partners such as Fair Supply Analytics. Our approach is proactive, data-driven, and designed to identify, assess, and manage modern slavery risks across our operations and supply chain.

### Risk identification and assessment

#### Supplier risk intelligence and mapping

We use Fair Supply Analytics' platform to assess suppliers across Tiers 1 to 10, evaluating geographic, industry, and sector-specific risks. Each supplier is assigned a risk, impact, and exposure rating, enabling targeted mitigation and continuous monitoring.

#### Global slavery index integration

Jurisdictional analysis from the Global Slavery Index, including prevalence, vulnerability, and government response, is systematically incorporated into our risk prioritisation and supplier engagement strategies.

#### Materiality and risk analysis

We conduct detailed assessments of modern slavery risk and materiality to ensure our efforts are focused where the risk is greatest. Suppliers identified as elevated risk due to their operations or downstream supply chains are required to complete modern slavery questionnaires. These responses are analysed via the Fair Supply Analytics' platform to generate a risk mitigation score, indicating the maturity of their risk management practices.

### Training and capacity building

We deliver training tailored to our organisation and supply chain including risk identification and ethical sourcing to promote a culture of awareness and accountability. Training is provided across procurement, people and culture, supply chain management, and leadership roles.

Additional training is undertaken by staff governing our modern slavery framework, covering areas such as supplier risk management, grievance mechanisms, and remediation.

## Policy framework

BN has implemented a suite of modern slavery-specific policies and procedures that set clear expectations for ethical conduct and provide accessible mechanisms for reporting concerns, including:

- **Modern Slavery Policy**
- **Human Rights Grievance Policy**
- **Supplier Code of Conduct (Modern Slavery)**
- **Responsible Procurement Policy**
- **Supplier Management Policy**
- **Whistleblower Policy**

These policies are aligned with international human rights standards and require suppliers to adopt fair and ethical workplace practices.

## Collaboration and sector engagement

BN actively participates in industry initiatives to promote shared learning and continuous improvement, including:

- **Modern Slavery Co-Lab**
- **Legal Responsible Business Network**
- Memberships with **Australian Legal Sector Alliance, Fair Supply Analytics, Sedex and EcoVadis.**

## Governance and oversight

BN's modern slavery framework is governed by a dedicated Director responsible for leading our responsible business strategy, with oversight from the Board. Regular reporting ensures transparency, accountability, and alignment with our ethical commitments and organisational values.

These measures ensure that BN's due diligence approach is rigorous, transparent, and continuously evolving to address emerging risks and uphold our commitment to ethical business practices.

## Remediation

During the reporting period, no actual or suspected cases of modern slavery were identified within our operations or supply chain.

Should a case arise, BN has established policies and procedures to respond promptly and effectively. Our Human Rights Grievance Procedure provides a clear and accessible process for any person, including staff, contractors, suppliers and clients, to raise concerns. Where a complaint is substantiated, our overriding objective is to address any human rights abuse and prioritise the wellbeing and restoration of any affected

individuals. This includes taking steps to address harm and prevent recurrence.

## Effectiveness of actions

BN is committed to continuously improving the effectiveness of our modern slavery risk management framework. We assess the impact of our actions through a combination of quantitative metrics, qualitative feedback, and governance oversight.

## Performance indicators

### Supplier risk metrics

Via Fair Supply Analytics, we track and record our supply chain risk metrics, which include the number of suppliers, economic value, estimated number of people in forced labour per million dollars, estimated number of people in forced labour, share of estimated people in forced labour, industry rating, risk mitigation score, and adjusted risk rating.

### Supplier engagement

We monitor the number of suppliers completing modern slavery questionnaires and the proportion of contracts that include modern slavery clauses or reference our Supplier Code of Conduct.

### Training completion rates

We track modern slavery training undertaken by staff within procurement, people and culture, and leadership roles, including the total hours undertaken, modules undertaken, and compliance percentage.

### Grievance tracking

We record the number and nature of human rights-related grievances raised through our Human Rights Grievance Procedure. If grievances are raised, we will also assess the timeliness and effectiveness of remediation efforts, including supplier collaboration and support for the affected persons.

## Qualitative reviews

### Policies and procedures

Our policies and procedures are reviewed annually to ensure they remain current with legislative developments, stakeholder expectations, and sector-wide learnings.

### Framework

Lessons learned from supplier engagement, training feedback, and any grievance procedures are used to refine our framework. We document changes made to policies, training content, and supplier onboarding processes to demonstrate progress over time.

## Governance

Effectiveness is monitored through regular reporting to the Board and governance by a designated Director who leads our responsible business strategy. This oversight ensures accountability and alignment with BN's ethical commitments and organisational values.

## Continuous improvement achievements

BN is committed to continuous improvement in managing modern slavery risks. The following table summarises key achievements over the reporting period, reflecting progress in supplier engagement, staff capability, policy implementation, and risk reduction.

### Achievements

**Risk assessed by Fair Supply Analytics:** 56% reduction in supply chain impact, and no change in exposure, across total value chain.

100% of our highest risk suppliers assessed as having 'Advanced' modern slavery practices.

**Supplier engagement:** 100% completion rate for modern slavery questionnaires by suppliers identified for additional information.

**Staff capability:** 50% more staff completed training across leadership, People & Culture, and procurement roles.

**Policy & procedures:** Modern slavery-specific policies and procedures implemented and embedded across operations and supply chain.

**Incidents:** No recorded incidents of modern slavery during the reporting period.

## Consultation

As a single reporting entity, our consultation process focused on engaging relevant internal stakeholders to ensure a comprehensive understanding of our operations and supply chains. Through internal discussions and data reviews, we identified areas of potential risk and developed mitigation strategies. This process informed the development of our modern slavery statement and supports our ongoing commitment to ethical and responsible business practices.

## Approval

In accordance with section 13(2) of the *Modern Slavery Act 2018* (Cth), this Statement was approved by the Board of BN Law Ltd, the principal governing body, on 16 November 2025. The Board has authorised Peter Murdoch, Director and Chairman of the Board, to sign this Statement.



*Peter Murdoch*

Principal & Chairperson of the Board

