

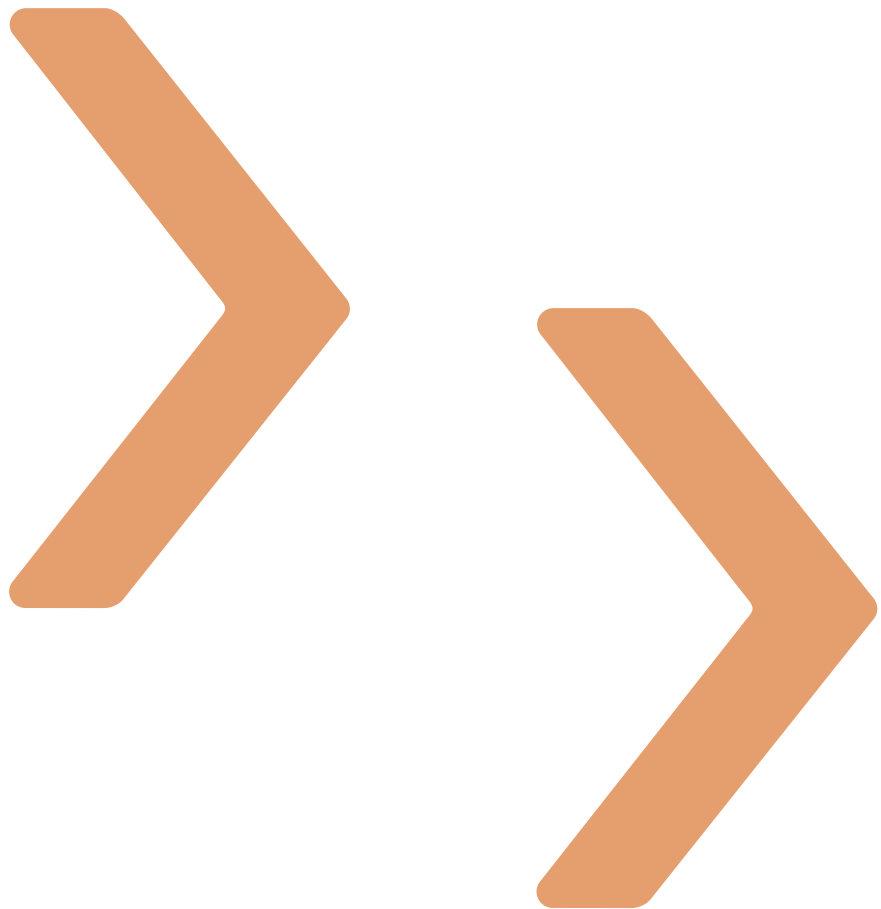


Modern Slavery Statement FY24

1 July 2023 – 30 June 2024

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Section 1:

Introduction

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) by Wotton + Kearney Holdings Ltd (**ABN 60 632 647 306**) on behalf of itself and its two wholly owned subsidiaries, Wotton + Kearney Pty Ltd (**ABN 94 632 932 131**) and Pinsani Pty Limited (**ABN 84 099 079 802**), which operate as part of the Wotton Kearney group. The statement sets out the actions taken by the Wotton Kearney group (“Wotton Kearney”) to address modern slavery risks in our supply chains and operations for the financial year ending 30 June 2024 and will be reviewed and updated annually.

This is Wotton Kearney’s third Modern Slavery Statement, pursuant to our obligations under section 13 of the Modern Slavery Act.

What is Modern Slavery?

Modern slavery is a broad concept relating to systematic abuse of fundamental human rights in contemporary workforces. It is generally accepted as encompassing eight types of serious exploitation namely: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or service and the worst forms of child labour.

Modern slavery breaches the most fundamental freedoms and human rights of individuals. Wotton Kearney rejects all forms of modern slavery and recognises that modern slavery is never acceptable in any of its forms.

Section 2: Structure, Operations and Supply Chain

Founded in 2002 with two partners, four lawyers and boundless ambition, Wotton Kearney now has a dynamic force of over 700 professionals, including 85+ partners, spanning 10 offices across Australia, New Zealand, and Singapore.

Wotton Kearney is the 'go-to' firm in the Asia Pacific region for the majority of local, global and London market insurers, as well as brokers and corporates, particularly with the more complex issues facing the market. We are highly regarded in the areas of complex property, energy and infrastructure claims, general liability (including product liability, property damage and public liability), and financial lines (including D&O, regulatory investigations and professional liability claims).

Wotton Kearney also has specialist teams in the areas of cyber, privacy and technology, government, healthcare, marine and transport, media and defamation, workplace and safety, as well as a dedicated commercial litigation and class actions offering. For more information about our services, please click [here](#).

Under the Modern Slavery Act, Wotton + Kearney Holdings Ltd (**ABN 60 632 647 306**) is a reporting entity pursuant to section 5(1). Wotton + Kearney Holdings Ltd is an unlisted public company limited by shares, incorporated and domiciled in Australia.

Wotton + Kearney Pty Ltd (**ABN 94 632 932 131**) is an incorporated legal practice registered in Australia. Pinsani Pty Ltd (**ABN 84 099 079 802**) is a private company incorporated and domiciled in Australia. Wotton + Kearney Pte Ltd (**UEN 202348319W**) is a private limited company, domiciled in Singapore, wholly owned by Wotton + Kearney Pty Ltd. The principal activity of the group is the provision of legal services in Australia and Singapore.

Wotton + Kearney Limited (**NZBN 9429031331227**), is a separately constituted and regulated legal entity registered in New Zealand, with offices in Auckland, Christchurch, and Wellington.

Wotton Kearney procures goods and services for the purpose of providing legal services. In FY24, our supply chain involved 3,336 suppliers of goods and services across the following main categories:

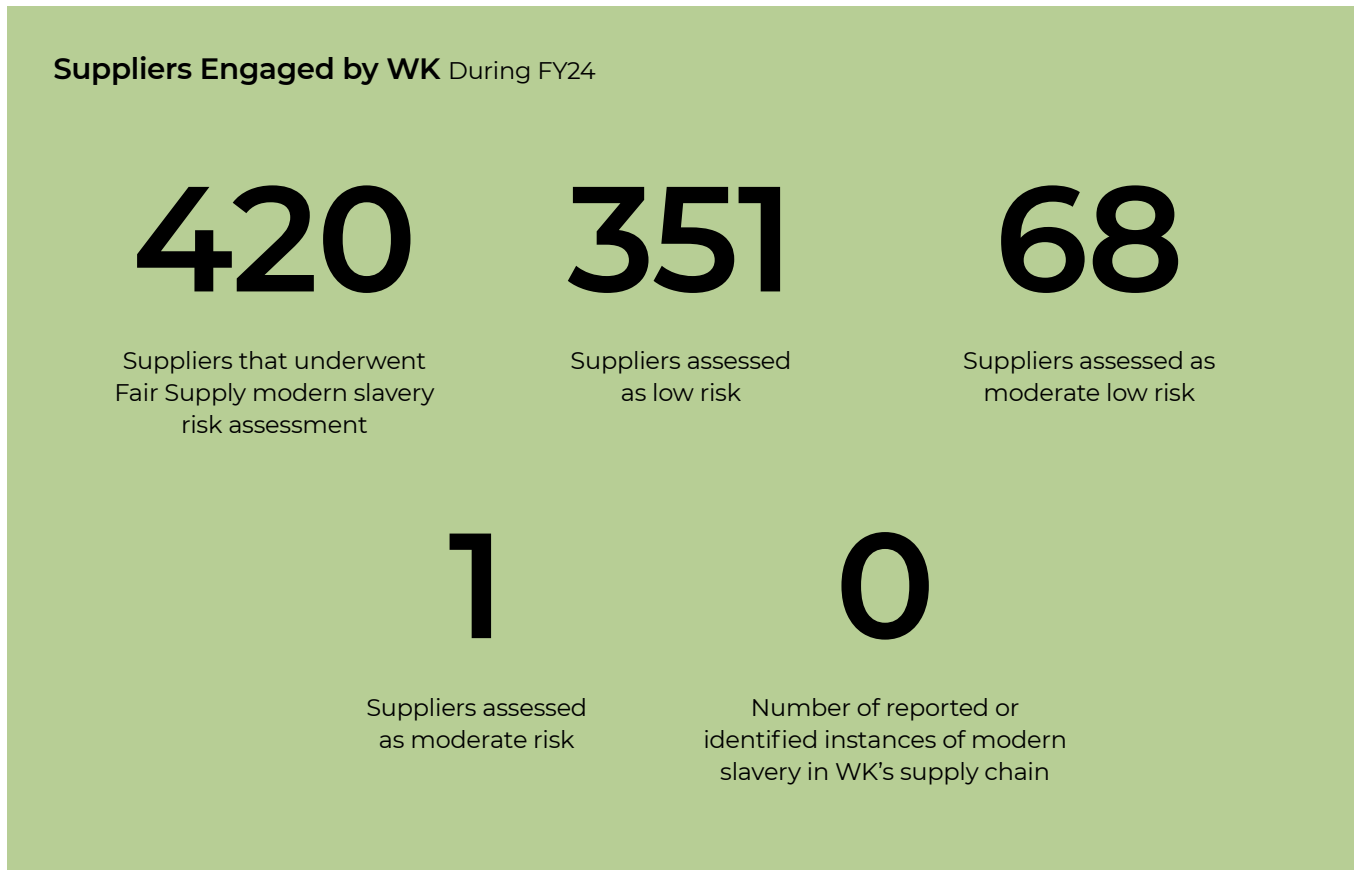
- Legal creditors such as barristers and experts
- Business services and products such as printing and cleaning
- Hotel and restaurant services
- Textiles
- Retail trade services such as stationery and office supplies
- Construction and fit out
- Computer and IT services
- Education and training
- Occupancy of premises and parking
- Travel agency services
- Professional services such as accounting and legal services.



Section 3: Modern Slavery Risks in WK's Operations and Supply Chain

There is generally a low risk of modern slavery occurring in our operations. As a law firm, most of our operations relate to the provision of legal services to commercial clients. The majority of our employees are legal and business service professionals situated in Australia. Of the 50 million people estimated to be living and working in modern slavery globally, it is estimated 1,500 to 41,000 of these people are in Australia.¹

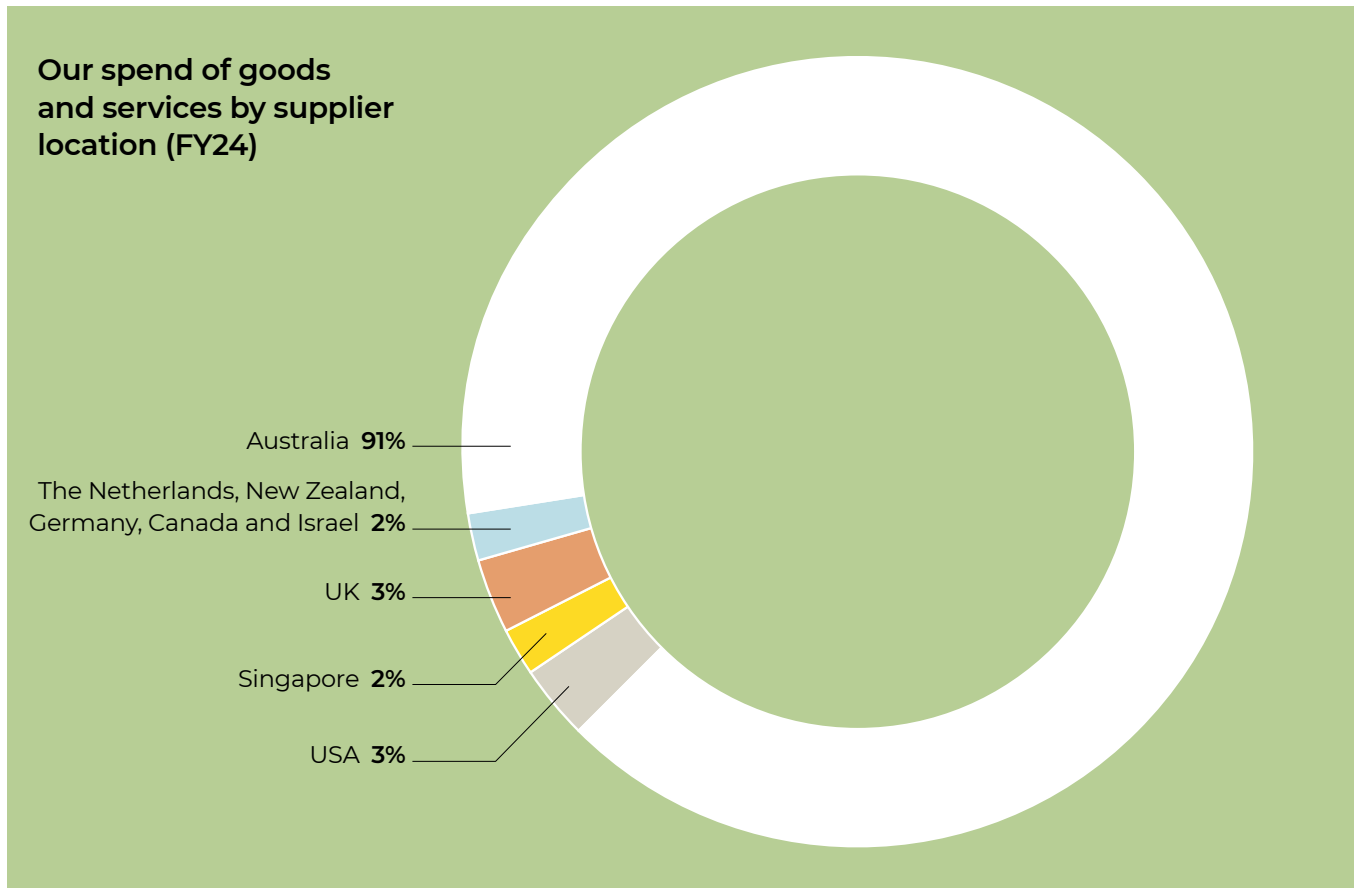
Wotton Kearney undertakes a detailed mapping of its supply chain each year in partnership with Fair Supply, a global ESG data provider and consultancy. This financial year's assessment considered 420 suppliers with the highest spend amounts. Legal creditors such as barristers and experts were excluded from the assessment. Risk was determined based on the industry, amount spent, sector and the geographical location of the products or services. The overall risks of modern slavery occurring in our supply chains have been assessed as being relatively low.



¹ Global Slavery Index: Australia, Walk Free, 2023.

Modern Slavery Statement

The pie chart below shows our total spend for our FY24 financial year by supplier location. 91% of our spend was within Australia. Our overseas expenditure spanned suppliers based in 9 countries, including the USA (3%), the United Kingdom (3%), Singapore (2%), the Netherlands, New Zealand, Germany, Canada and Israel. This was largely confined to IT, consulting and business development services.



While we have not identified any instances of causing modern slavery in our operations or supply chains, Wotton Kearney recognises that modern slavery risk exists across all sectors and organisations which may mean we are directly or indirectly exposed to the risk of modern slavery.

Our risk assessment has identified 5 industries within our supply chain with an elevated risk of modern slavery. We have set out below some context for that elevated risk. In response, we have tailored our modern slavery actions for the next financial year to focus on suppliers that fall within these industries and mitigate the risk through risk controls and due diligence criteria in the procurement and tender process.

Business services – office premises, cleaning, and recruitment

In FY24, business services were identified as one of the higher-risk industries for potential modern slavery within our supply chains. This category captures a wide range of services, including recruitment, office leasing, and facilities management, with specific risks

emerging within the supply chains for cleaning, waste management, and security services. Wotton Kearney recognises these services represent a key risk area for modern slavery in Australia due to the prevalence of wage underpayment, subcontracting arrangements, excessive working hours and occupational health and safety issues. Migrant workers are especially vulnerable to exploitation in these sectors.

Most of our suppliers in recruitment services and facilities management have indicated they are mandatory reporting entities under the Australian modern slavery legislation. While this does not guarantee the absence of modern slavery, it is a positive indication that these suppliers are taking significant steps to address the issue and comply with the legislation.

Following the relocation of our Sydney and Melbourne offices, we are embarking on renewed risk assessments of the primary cleaning suppliers that our facilities management services rely upon. We intend to increase the level of engagement with the primary suppliers of cleaning and security services that fall within the second tier of our office leasing and facilities management supply chains.

Hospitality

This is the first-year hospitality services have appeared as an industry with an elevated risk in our supply chains. Catering services, hotels and restaurants are particularly vulnerable to exploitation due to the industry's labour-intensive nature and connection with agricultural supply chains.

Wotton Kearney will be using the findings from Fair Supply's risk assessment to undertake greater analysis of the key suppliers within this space in the next reporting period. While our catering providers are locally sourced and have not been identified as carrying out activities linked to modern slavery, we recognise they rely upon wholesale sourcing of food products that has commonly been linked with exploitation of migrant workers on farms. Considering this, we plan to take more proactive steps in engaging directly with our primary catering services in the next year to ensure positive practices.

As part of our broader responsible business overview, we are looking at our preferred accommodation providers. We are committed to working more closely with our corporate travel agent in FY25 to examine how we can enhance our assessment and mitigation measures to address the inherent risks of modern slavery in the hotel industry.

Textiles

The relocation of our Sydney and Melbourne offices saw an increased expenditure on textiles in FY24 mostly related to furniture and fit outs. Textiles can carry an elevated risk of modern slavery due to its raw inputs and the multiple tiers of their supply chains. The demanding turnaround times and reduced profit margins surrounding the production of textiles can lead to a reliance on subcontracting informal and home-based workers. This can often be women and girls in high-risk geographies, where risks of debt bondage, abuse and child labour are particularly high.²

This industry category represents a small proportion of our supplier spend in this reporting period (less than 0.01%). The majority of that spend was with one furniture supplier.

We have not identified any specific allegations of modern slavery in this industry category, however will continue to monitor it over the next year.

Construction and fit-out

Wotton Kearney had a higher spend in FY24 on construction costs associated with the relocation of our Sydney and Melbourne offices and the initial stages of relocating our Brisbane office ahead of its move in 2025. The high demand for a base-skill workforce, use of labour-hire agents, and reliance on migrant workers make construction an elevated risk for modern slavery. The prevalence of subcontracting in the construction industry also makes it harder to oversee working conditions and ensure compliance with labour standards.

To mitigate these risks, we undertook detailed modern slavery risk assessments of the construction companies engaged for the fit out for the Sydney and Melbourne offices respectively. Our assessments revealed these suppliers had adopted stringent mitigation measures, including undertaking regular training tailored to the specific workforce risks in its sector as well as participating as active members of the Property Council of Australia's modern slavery working group. While no instances of modern slavery were identified, we recognise it as an area for ongoing due diligence.

Office supplies – printing and electronic hardware

Wotton Kearney has identified office supplies, particularly electronic hardware and printing services, as an area of potential modern slavery risk within our supply chain.

The manufacturing of electronic devices is especially vulnerable to exploitation, due to its dependence on low-skilled, low-paid labour, often occurring in countries with limited regulation. According to the Walk Free 2023 Global Slavery Index, electronics are the top imported product in Australia at risk of modern slavery.

As a law firm, we are aware that our reliance on electronic hardware and printing services exposes us to modern slavery risks. We are therefore committed to continuing to engage with our suppliers to ensure positive practices are being upheld. We recognise the need for ongoing assessments in this area, due to the extended supply chains of our providers.

In FY24 we undertook a review of our primary supplier for office supplies, assessing each potential supplier against ESG credentials, including modern slavery risks. As a result of this procurement process, we transitioned to a different office supply company and have established strong communication and reporting channels for social procurement.

² Walk Free, 'Global Slavery Index: Stitched with slavery in the Seams', (2023) <<https://www.walkfree.org/global-slavery-index/findings/spotlights/stitched-with-slavery-in-the-seams/>>.

Section 4: Actions to Assess and Address Modern Slavery Risks


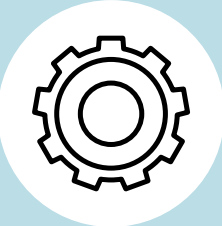
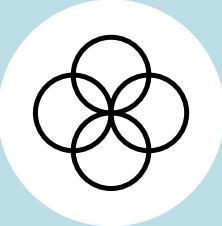
In FY22 we set the foundations for our modern slavery response and built on these in FY23 by developing a rights-based approach. Our third year of reporting under the Modern Slavery Act has seen our focus shift towards collaborative industry partnerships and supplier-specific due diligence.

Our efforts in FY24 took into account reviews by Fair Supply, the NSW Anti-Slavery Commissioner and the Australian Human Rights Commission of the modern slavery statements published since the Modern Slavery Act came into force. Recommendations we

incorporated into our modern slavery plan for FY24 included:

- Collaborating with industry peers, worker organisations, civil society and human rights experts to develop more efficient and effective modern slavery responses.
- Reviewing and strengthening our risk assessment process.
- Directing our pro bono work and partnerships to make a meaningful contribution to the sector and global effort to address modern slavery.

Our key actions in FY24 were as follows:

	Understanding the risk
	<ul style="list-style-type: none">• Annual modern slavery risk assessment of our supply chain carried out by Fair Supply• Supplier risk assessments (new and existing suppliers)• Give weight to modern slavery risk assessments in tender process• Demonstrate responsible purchasing practices
	Building staff awareness and capacity
	<ul style="list-style-type: none">• Raise awareness of Modern Slavery Policy and Grievance Policy and publish Modern Slavery Policy, Grievance Policy and Supplier Code of Conduct on website• Inform staff of our modern slavery risks• Modern slavery training for staff and tailored training for procurement teams
	Collaboration and engagement
	<ul style="list-style-type: none">• Collaborate with the legal sector to better understand modern slavery risks in common supply chains.• Build awareness of modern slavery through pro bono work and partnerships• Support advocacy of our pro bono partner organisations to strengthen modern slavery legislative requirements

Understanding the Risk

We continue to assess modern slavery risks pre-contract by requiring new suppliers to complete a modern slavery questionnaire. The questionnaire addresses a supplier's awareness of the risks of modern slavery, training to its staff and suppliers, and mitigation measures. Responses to the questionnaire can be used to guide engagement with suppliers and identify corrective actions. This financial year we refined the risk ratings for our self-assessment questionnaires to capture supply-chain specific risks and better tailor our responses to sectors with elevated risks of modern slavery.

This reporting period we incorporated our previous Modern Slavery Supplier Code of Conduct into our broader standard terms for contracting with suppliers.

There were zero reports of instances of modern slavery this reporting year, however we recognise that usage of a grievance mechanism does not necessarily reflect our modern slavery risk.³ In FY23 we amended our Modern Slavery Policy and Grievance Policy to improve its accessibility and effectiveness. We also introduced an online reporting form to improve the process for making anonymous and confidential reports of modern slavery. Looking ahead, we will continue to review the effectiveness of our grievance mechanism and explore ways in which we can improve its accessibility.

In FY24, Wotton Kearney entered into a service agreement with an outsourced billing service located in the Philippines. Wotton Kearney recognises the Philippines is a higher risk jurisdiction than Australia and has taken a range of measures to actively monitor for modern slavery risks in our Philippines supplier. We completed a modern slavery risk assessment of both the Australian entity and Philippines subsidiary, including meeting with senior staff from both entities, as part of the procurement process. Senior staff from Wotton Kearney's Australian offices attended the Philippines shortly after our service agreement commenced, delivering training including on modern slavery as well as inspecting for signs of modern slavery risks with none detected. Wotton Kearney has ensured that all staff in the Philippines are paid fairly and employment practices are conducted in compliance with applicable human rights standards.

Building staff awareness and capacity

We provided training for staff outlining the nature of modern slavery risks, indicators of modern slavery and ways to respond. Modern slavery training is integrated into our staff inductions, with refresher training available for our staff on our internal learning platform. We also delivered tailored training to key personnel involved in procurement and/or supplier contracts outlining our modern slavery assessment and supplier engagement responsibilities.

We have created a dedicated page on modern slavery on our staff intranet, with links to our policies, training videos and other resources.

This reporting period we also expanded the initiatives of our Community Footprint program, comprising of our pro bono, responsible business and community teams, to support charities and international organisations in the modern slavery sector. We hosted sessions with Hagar Australia and Project Futures that offered the opportunity for our staff and clients to learn from survivors of modern slavery and raise awareness of survivor-led initiatives.



³ Global Compact Network Australia 2021, Effective Modern Slavery Grievance Mechanisms: A Case Study Publication for Business. unglobalcompact.org/library/5884 [24 May 2022].

Modern Slavery Statement

Collaboration and engagement

We acknowledge the importance of collective action to enhance our capacity to address high risk suppliers and address the systemic challenge of modern slavery. This year we continued to build our engagement with external partners to share good-practice and enhance our modern slavery response.

We are an active member of the Modern Slavery Co-Lab hosted by the Australian Legal Sector Alliance, a collaborative network sharing expertise to improve modern slavery responses within the legal sector. This year, we convened two Responsible Business roundtable forums with members of the Australian Pro Bono Network focusing on shared supplier engagement, the improvement of data quality and anti-slavery efforts across the legal sector.

We continue to work closely with our pro bono partners to support their advocacy and research in addressing modern slavery risks in Australia. This reporting period we seconded a lawyer, on a pro bono basis, to the Australian Human Rights Commission to contribute to the Commission's modern slavery work. During her time at the Commission, Isabelle Carpenter explored the intersectionality of decarbonisation and modern slavery:

My work has involved researching and drafting a memorandum for the climate and business teams to inform the Commission's climate policy advocacy. The memorandum is based on a 'Just Transition' and seeks to answer the question of how we can decarbonise without causing or exacerbating existing human rights issues. The core issue I've been exploring is modern slavery and its ubiquity in supply chains of the renewable energy industry. Modern slavery is a global issue that involves the exploitation of people through violence, threats or coercive measures, and includes things such as human trafficking, child labour and forced labour.

Unfortunately, as Australia attempts to decarbonise, many of the materials for our renewable energy systems are sourced from countries where labour conditions for workers can be extremely exploitative and dangerous, often featuring serious corruption or conflict. The research is guided by Australia's Modern Slavery Act and suggests improvements to this legislation and other public policies that would encourage entities to better identify and prevent modern slavery risks in their supply chains. In addition, it features other issues such as workers' rights and how we can support those in the fossil fuel industry throughout this transition. It also discusses issues faced by First Nations people in their interactions with the renewable energy industry regarding land rights and issues of self-determination. I'm very happy to have had the opportunity to take part in advocating for such an important issue and hope to have made a meaningful contribution!

Wotton Kearney welcomes the establishment of Australia's first Anti-Slavery Commissioner following the passing of the *Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Bill 2023*. We are proud to have provided pro bono support to the Australian Human Rights Commission and contributed supporting research to inform the Commission's Senate submissions on the Bill. We welcome the appointment of Commissioner Evans and look forward to supporting the work of his office in implementing future modern slavery responses.



Section 5: Measuring the Effectiveness of our ongoing Modern Slavery Response

The focus of our third year of reporting has centred on expanding upon the progress made in FY23 and refining our processes to minimise our modern slavery risks. We continue to monitor and track our progress through a measure of reviews, oversight, and tracking KPIs. KPIs to track actions to address modern slavery include:

	<p>Understanding the impact and risk of causing, contributing to or being directly linked to modern slavery</p>
	<ul style="list-style-type: none"> • Number of modern slavery questionnaires completed • Number of new and existing suppliers screened • Assigning suppliers with a risk rating following a risk assessment
	<p>Reviewing our policies and procedures</p>
	<ul style="list-style-type: none"> • Number of suppliers who have incorporated modern slavery provisions in contracts and/or our Modern Slavery Supplier Code of Conduct • Annual review of our Modern Slavery Policy and Modern Slavery Grievance Policy • Number of recorded modern slavery incidents, the type of human rights issue raised and the outcome
	<p>Building staff awareness and capacity</p>
	<ul style="list-style-type: none"> • Number of staff trained in identifying and addressing modern slavery • Number of key personnel who completed targeted training • Number of training sessions conducted (included format and topics covered)

We will assess our systems to ensure our policies and processes are operating effectively to mitigate the risk of modern slavery within our operations and our supply chain.

Section 6: Looking ahead

In FY25, we will continue to build on and strengthen our modern slavery response. Some of our key initiatives include:

- Work jointly with industry peers, worker organisations, civil society and human rights experts to develop more effective modern slavery responses and foster a culture of accountability.
- Review and identify opportunities to enhance awareness of modern slavery risks throughout our operations, with a focus on increasing staff engagement on elevated areas of risk in our supply chain and targeted training for staff involved in procurement.
- Build upon our supplier relationships in our higher risk and spend areas, including exploring ways to collaborate and mitigate our risks of modern slavery. This will include:
 - Collaborating with industry peers to better understand and assess the risk of modern slavery from legal creditors and barristers.
 - Increasing the level of engagement with the primary suppliers of cleaning and security services that fall within the second tier of our office leasing and facilities management supply chains.
 - Engaging with our primary catering services.
 - Working more closely with our corporate travel agent to better address the inherent risks of modern slavery in the hotel industry.
- Continue directing our pro bono work and partnerships to make a meaningful contribution to the legal sector and global effort to combat modern slavery. This includes exploring opportunities to provide pro bono legal support to improve access for people with lived experience to achieve effective remedy, including self-determination, justice and empowerment.
- Improving how we measure the effectiveness of our ongoing modern slavery response.

Consultation and statement approval

Because of the shared management and governance of Wotton + Kearney Holdings Ltd, Wotton + Kearney Pty Ltd and Pinsani Pty Ltd, the preparation of this statement was inherently consultative.

In accordance with section 13 of the Modern Slavery Act, this statement was approved by the Board of Wotton + Kearney Holdings Ltd on 5 December 2024 and is signed by David Kearney, Director and Chief Executive Partner.

Signed:



David Kearney
Chief Executive Partner
Wotton Kearney



Australian offices

Adelaide

Lvl 1, 25 Grenfell St
Adelaide, SA 5000
+61 8 8473 8000

Brisbane

Lvl 23, 111 Eagle St
Brisbane, QLD 4000
+61 7 3236 8700

Canberra

Ste 4.01, 17 Moore St
Canberra, ACT 2601
+61 2 5114 2300

Melbourne

Lvl 30, 500 Bourke St
Melbourne, VIC 3000
+61 3 9604 7900

Perth

Lvl 49, 108 St Georges Tce
Perth, WA 6000
+61 8 9222 6900

Sydney

Lvl 9, Grosvenor Plc
225 George St
Sydney, NSW 2000
+61 2 8273 9900

New Zealand offices

Auckland

Lvl 8, 21 Queen St
Auckland 1010
+64 9 377 1854

Christchurch

202/235 High St
Christchurch 8011
+64 3 667 4003

Wellington

Lvl 12, 342 Lambton Qy
Wellington 6011
+64 4 499 5589

Asia office

Singapore

138 Market St
05-01, CapitaGreen
Singapore, 048956
+65 6967 6460

