



MODERN SLAVERY STATEMENT

1 JULY 2020 – 30 JUNE 2021

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1 REPORTING ENTITY

This modern slavery statement is made in compliance with the *Modern Slavery Act 2018* (Cth) (the **Act**) on behalf of:

- + Gilbert + Tobin (the Partnership) ABN 88 775 098 848
- + G&T Service Company Pty Ltd as trustee for G&T Services Trust ABN 77 458 970 098
- + G&T Premises Pty Ltd ABN 64 091 984 922
- + G&T Consultants Pty Ltd ABN 46 068 298 448
- + G&T Professional Service Company Pty Ltd as trustee for G&T Professional Service Unit Trust ABN 96 431 953 017
- + G&T Foundation Pty Ltd as trustee for the Gilbert + Tobin Foundation ABN 96 679 503 419
- + G&T LegalTech Solutions Pty Limited as trustee for G&T LegalTech Solutions Trust ABN 64 876 640 692
- + G&T Tax Services Pty Limited as trustee for G&T Tax Agent Unit Trust ABN 95 332 013 597
- + G&T Capital Services Pty Ltd ACN 649 676 111

The reporting entities are referred to collectively in this statement as “**G+T**” (**we / us / our**). This statement has been prepared in consultation with the above reporting entities.

This modern slavery statement covers the period of 1 July 2020 to 30 June 2021 (**Reporting Period**).



2 OUR STRUCTURE AND OPERATIONS



G+T is an independent Australian law firm. The firm was founded in 1988 and we aspire to be Australia's leading transactions, disputes and regulatory law firm, committed to outstanding corporate citizenship. Our business provides legal services to corporations, governments and other organisations on their most challenging issues.

Our team is made up of over 900 people, located across three offices, in Sydney, Melbourne and Perth. We do not have any overseas locations, however, we regularly advise international clients and work closely with leading overseas law firms to support our clients.

Gilbert + Tobin, an unincorporated partnership of 89 individuals, provides legal services to clients. The partnership employs our admitted legal practitioner staff. G&T Service Company Pty Ltd, as trustee for the G&T Services Trust (**GTS**), provides operational services to support the partnership, in some cases through associated entities. Staff that are not legal practitioners are employed by GTS. G&T Premises Pty Ltd holds the group's real estate leases and provides those services to the G+T group.

GTS delivers its services in part through an outsourced arrangement with Elevate Services Limited, who provides services from a dedicated service centre based in India.

The overall group is governed by a board selected from among the partners of Gilbert + Tobin. Each of the associated entities in the group have their own board of directors.

3 OUR SUPPLY CHAIN

There have been no major changes to our supply chain since the FY2020 reporting period. The most significant expenditure in our supply chain remains remuneration for our employed staff.

The remainder of our supply chain is related to spending on goods and services to support our people in the delivery of legal services to clients. The major categories include:



FACILITIES

Including leased office space and associated fit out and equipment;



TECHNOLOGY

Including hardware (such as phones, laptops, audio visual equipment and printers) and software;



OUTSOURCED TEAMS

We source some services, for example technology, finance and marketing support, word processing and document review, from teams of people provided by third parties, either on the basis that they are dedicated to G+T or are assigned to G+T work on an ad hoc basis;



TRAVEL AND HOSPITALITY

Including while our partners or staff are travelling and within our office environments;



INFORMATION AND DOCUMENT MANAGEMENT

Including third party printing, scanning, data analysis, legal database services and records management and storage;



MARKETING AND MERCHANDISE

Including marketing services (such as advertising and sponsorships) and merchandise (branded items such as pens, clothing, hats, umbrellas used for staff or client gifts);



STATIONERY

Mainly paper, pens, notebooks, folders and other items;



FINANCIAL SERVICES

Including bank lending and transaction services and insurances; and



LEGAL SERVICES DISBURSEMENTS

As part of our work with clients we are often responsible for procuring legal services from third parties on behalf of clients. This includes services from barristers, other law firms, independent consultants and expert witnesses. These are separate from the services we provide directly to our clients and the costs are typically passed through to clients as disbursements.

Excluding legal services disbursements, in the reporting period we have identified approximately 750 suppliers across the procurement categories (this is a reduction from 850 in FY2020). Over the past few years, we have pursued a deliberate policy to consolidate our spend to key suppliers in major categories to assist us to assess and manage any risks in these areas. During the reporting period, approximately 90% of the firm's total spend was with a core group of 100 of these suppliers.

4 DESCRIPTION OF MODERN SLAVERY RISKS

There were no significant changes to our suppliers in the reporting period. We reviewed our top 100 suppliers (by spend) for the reporting period and the risk category of the spend and confirmed as low risk for modern slavery.

Most of our suppliers are Australian-based. However, many of these suppliers themselves source goods or services from overseas. Some of these are from locations that may be more at risk of modern slavery. We recognise that the risks may be at the second or third stage removed from the party with which we have contracted.

The assessment of modern slavery risks was overseen by G+T's Operational Risk Committee. This committee comprises the accountable heads of operational functions (technology, HR, marketing, services, finance), representative partners of the firm, the General Counsel and Chief Operating Officer (COO). This Committee commissioned a risk-based analysis of our expenditure to identify particular areas of modern slavery risk.

The process involved assessing the risk of each supplier based on:

- + the type of product or service provided;
- + the geography of supply; and
- + any known supplier-specific issues.

Where a supplier had already made public its own modern slavery statement, this was reviewed to provide further context.

This analysis provided us with priority areas to focus our risk management efforts and due diligence for our suppliers.

Following this analysis, we identified four main areas in our supply chain to focus our initial attention, discussed below.

4.1 OUTSOURCED TEAMS

Where third-parties are providing the services of individuals to us under an outsourced arrangement, there is a risk of modern slavery issues with the employment of those individuals. This risk is heightened where the supply is from overseas, outside our immediate physical presence, and from countries where there are higher risk factors. We have a substantial team of people supporting our business supplied by Elevate Services in India, and a smaller, ad hoc word processing service from Exigent in South Africa.

While this was an area that warranted attention, we assessed the risks of modern slavery in this situation as low, given the substantial, regular engagement that we have with these suppliers and the following considerations:

- + both Elevate and Exigent are reputable top-tier suppliers of these services, with headquarters in the US and UK respectively;
- + our agreements with these suppliers are subject to terms relating to working conditions and treatment of their staff;
- + senior management or partners from G+T have personally visited and inspected the physical working premises of these teams. In the case of Elevate, before the pandemic, senior managers from G+T would visit the teams working on our behalf at least once every 6 months. However there have been no on-site visits during the reporting period. There were no complaints or disclosures through any channels, including our confidential whistle-blower platform Whisplii, from Elevate and Exigent staff.
- + senior managers from G+T are responsible for interacting with and managing these teams and know the outsourced staff and regularly meet with them on video and audio calls;
- + dedicated outsourced staff have access to G+T communications in the same way as our Australian-based staff. They have access to G+T's whistle-blower channels and protections and receive the same training and information on their availability; and
- + the market for people with the skills of these staff is competitive, particularly in India. Turnover occurs on a regular basis as opportunities emerge, indicating free movement for these staff.

This category of spend will remain a priority for attention and risk management in the future.

4.2 FACILITIES

Our expenditure on facilities is significant. Given the nature of some of the services provided, it presents some of the most important modern slavery risks.

Cleaning services are a high-risk sector in Australia with the low-skilled nature of the work presenting opportunities for exploitation and outsourced contracting (often in multiple tiers) obscuring labour conditions. Similar risks exist in other facilities services, such as maintenance contracts for plants and office equipment, as well as couriers.

We assessed this area of risk as “moderate”, given the nature of the sector. Our offices are all housed within buildings that are owned and operated by top-tier landlords, from whom we source much of these services. We have strong and continuing engagement with our landlords on this issue to understand and address any such risks.

Gilbert + Tobin has three key facilities suppliers – Jones Lang LaSalle (JLL), 101 Collins Street Pty Ltd and Brookfield. None of these suppliers responded to our modern slavery questionnaire, however JLL and Brookfield had modern slavery statements on their websites. We reviewed their modern slavery statements and confirmed that these suppliers have all implemented systems for managing modern risks within their business and supply chains.

4.3 MERCHANDISE

Our marketing function involves the purchase of branded goods, including stationery items, clothing and other giftware. These types of product can be higher risk because of the nature of their manufacture, which is usually overseas.

Over the past few years, we have focused on rationalising our suppliers for this type of purchase and ensuring that all procurement is done through a centralised marketing function. The greatest risk would be from individuals making their own purchases or orders from suppliers where the same level of inquiry would not have been completed.

The current approach requires all staff to only purchase such merchandise through an online portal with a single supplier, that has provided us with their Social Compliance Policy which assures us that they are compliant and monitor the modern slavery risks in their own supply chain.

We recognise this part of our supply chain as having particular risk and will be monitoring suppliers’ compliance with our policy documents closely.

4.4 TECHNOLOGY HARDWARE

Electronic goods such as computers, telephones, printers, screens, cables and other peripheral devices pose risks of modern slavery because of their complex and global supply chains. This applies to the sourcing of raw materials and the manufacturing and logistics processes along the supply chain.

This is a difficult area of risk that almost all businesses will face. G+T is a relatively small customer of the suppliers of this equipment. Addressing this risk will require coordinated, global actions from governments and all participants in the supply chain. For our part, we are focusing on ensuring our purchases are from top-tier reputable suppliers and engaging with those suppliers to better understand their supply chains and approaches to addressing the risks of modern slavery.

During the reporting period, our three key technology suppliers were sent our modern slavery questionnaire:

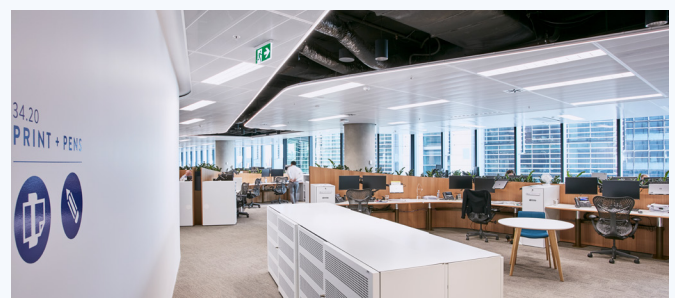
- + Two suppliers completed the questionnaire and no modern slavery risks were identified, and
- + One supplier did not complete the questionnaire but has a modern slavery statement. Their modern slavery statement was reviewed and demonstrated that the supplier has systems in place to manage modern slavery risks.

4.5 COVID-19

The COVID-19 pandemic may have increased the vulnerability of workers generally to modern slavery, including in Australia.

During this time G+T’s outsourced staff have continued to have access to the same G+T communications and whistle-blower channels as our local staff. Additionally, there was no significant change to facilities suppliers beyond the additional requirement of sourcing of appropriate sanitizing and cleaning products to comply with recommended sanitation protocols in the G+T Offices.

G+T has assessed whether COVID-19 has had an impact on our modern slavery risks and there are no such impacts to report.



5 DESCRIPTION OF ACTIONS TAKEN

G+T undertook actions in the following areas to assess, address and manage the risks of modern slavery during the Reporting Period:

- + launched Supplier Code of Conduct and Procurement Policy,
- + modern slavery questionnaire,
- + supplier rationalisation and on-boarding
- + staff awareness and education; and
- + supplier due diligence.



5.1 SUPPLIER CODE OF CONDUCT AND PROCUREMENT POLICY

In FY2020 we conducted a review of G+T's procurement processes and policies. Following the Reporting Period, these were consolidated into a single policy with a consistent framework for all procurement decisions. The Procurement Policy incorporates the firm's newly developed Supplier Code of Conduct and Anti-Bribery, Corruption and Fraud Policy. It also addresses our obligations under the Act, as well as our sustainability and supplier diversity procurement goals.

The next stage will be to send the Supplier Code of Conduct to our suppliers for acknowledgement. This will be undertaken as part of our new vendor on-boarding process to be implemented in FY2022.

5.2 MODERN SLAVERY QUESTIONNAIRE

In the reporting period, we sent our top 97 suppliers (by spend) a modern slavery questionnaire. The questionnaires were sent to the suppliers in April 2021. As at 30 June 2021:

- + 31 suppliers had completed the questionnaire and no modern slavery issues were flagged,
- + 37 suppliers did not respond to the questionnaire but these suppliers have published modern slavery statements, some under the Act and some under foreign modern slavery legislation,
- + 26 suppliers did not respond to the questionnaire and did not have modern slavery statements on their websites.

We decided not to require suppliers with modern slavery statements to complete our modern slavery questionnaire. We are continuing to prompt the remaining 27 suppliers to complete the questionnaire.

In FY2022 we will be introducing a new compliance management platform called 6clicks which will be used in supplier onboarding and should improve the questionnaire's usability. Going forward we will continue to annually survey our suppliers to ensure the top 100 (by spend) have a modern slavery statement or have completed a modern slavery questionnaire.

5.3 SUPPLIER RATIONALISATION AND ON-BOARDING

As noted in our last modern slavery statement, as part of our assessment of supplier management and rationalisation, we identified that our procurement of goods and services utilises a large number of suppliers. We have a relatively decentralised approach, with a significant number of staff authorised to make purchases, which creates a long tail of small suppliers. As well as leading to higher than necessary costs, this may increase the risks of modern slavery in our supply chain.

Over the past several years, including during the Reporting Period, we have engaged in a process of centralising information and record keeping of suppliers and rationalising the number of suppliers for each procurement category.

The management of suppliers has been increasingly formalised with a process for contracting and ensuring that suppliers are aware of and comply with our policies. In FY2022 we will introduce the firm's first on-boarding process for suppliers that will require them to formally acknowledge our Supplier Code of Conduct and to complete the modern slavery questionnaire or provide a copy of their modern slavery statement. We will also be training our staff to ensure the on-boarding process is adhered to for all new suppliers.

5.4 STAFF AWARENESS AND EDUCATION

On 30 March 2021, partner Andrew Hii delivered a modern slavery training session with all operational heads and any staff involved in procurement. The training covered:

- + Modern slavery worldwide,
- + Modern slavery in everyday products,
- + International responses,
- + The Australian Modern Slavery Act,
- + What is modern slavery,
- + Who must comply,
- + Requirements for compliance,
- + What must statements address,
- + Preparing for compliance,
- + Identifying modern slavery risks, and
- + Understanding the risk exposure

In the next reporting period, staff will be trained on the firm's new Procurement Policy, Supplier Code of Conduct and Modern Slavery questionnaire. We will review our training sessions annually and make amendments to ensure that all changes are made to meet the changes in the legislation.



5.5 SUPPLIER DUE DILIGENCE

Where G+T identifies any higher risk suppliers, G+T will continue to monitor the performance of such suppliers and will review their service contracts when these contracts comes up for renewal. G+T will also update any higher risk supplier contracts to include provisions supporting compliance with Modern Slavery requirements or consider whether an alternative supplier may need to be engaged.

6 ASSESSMENT OF EFFECTIVENESS

We will continue to review our policies and procedures to ensure that we are effectively monitoring and assessing any risks in our operations and with our suppliers. This will involve consideration of stakeholder engagement with our policy documents and procedures. We will update these policies and procedures where appropriate following such review, or in response to changes and developments relating to modern slavery risks more broadly. In the next reporting period, we will implement a quarterly update on modern slavery risks to the firm's operational risk committee.

7 CONSULTATION

All of G+T's associated entities (as listed in section 1 above) have been made aware of the Act's requirements and these have been endorsed by the various boards.

G+T's **COO** contributed to the development of this modern slavery statement and is a director of the majority of G+T's entities. The COO has engaged with senior leaders of the G+T entities, and notified the various boards of their entity requirements, which has been endorsed by these boards.

8 APPROVAL

This modern slavery statement was approved by the board of the Gilbert + Tobin partnership on 15 December 2021. The Boards of the other entities listed in section 1 then subsequently have adopted this modern slavery statement for their operations.

Approved by G+T Board: 15 December 2021

Last updated: December 2021

Next review: December 2022

Signed by



Name: Danny Gilbert

Title: Managing Partner and Member of the Board of Gilbert + Tobin and Director of G&T Premises Pty Ltd

Date: 13 December 2021



Name: Samuel Nickless

Title: Chief Operating Officer of Gilbert + Tobin and Director of G&T Service Company Pty Ltd, G&T Consultants Pty Ltd, G&T Professional Service Company Pty Ltd, G&T Foundation Pty Ltd, G&T LegalTech Solutions Pty Limited, G&T Tax Services Pty Limited, and G&T Capital Services Pty Ltd

Date: 13 December 2021



