

# MODERN SLAVERY STATEMENT



DECEMBER 2022 | BARTIER PERRY PTY LIMITED ACN 124 690 053

WWW.BARTIER.COM.AU

### A MESSAGE FROM THE CEO

Bartier Perry is committed to upholding human rights throughout our organisation, operations, and dealings with others. We believe every person has the right to freedom, safety and respect, and recognise the importance of eradicating modern slavery as a key part of protecting human rights.

I am pleased to present Bartier Perry's second Modern Slavery Statement which outlines our continuing efforts to identify and tackle modern slavery risks throughout our operations and supply chains.

No increased risks of modern slavery were identified in our operations and supply chains during the Reporting Period, with the overall risk of modern slavery continuing to be assessed as very low.

With the principle of continuous improvement at the heart of Australia's modern slavery regime, we have focussed our efforts on preparing solid foundations so that we can continue to develop and implement processes to identify and assess modern slavery risks. As our organisation grows and evolves, we will strive to continuously assess and improve our approach.

Bartier Perry is not required to report under the *Modern Slavery Act 2018* (Cth) but chooses to do so voluntarily. Our voluntary reporting illustrates our awareness of, and commitment to eradicating modern slavery.

We believe there is no place for modern slavery in our supply chain or in our community. We strive to remain vigilant and will maintain our focus on human rights.

Riana Steyn Chief Executive Officer

Under Frankland

Andrew Frankland Director and Board Chair

This Modern Slavery Statement is approved by the CEO and Board of Bartier Perry

### OVERVIEW OF BARTIER PERRY'S MODERN SLAVERY TRACKING

The *Modern Slavery Act 2018* (Cth) requires organisations with consolidated annual revenue of more than \$100 million to submit an annual statement (**Modern Slavery Statement**) describing their actions to identify, assess and address modern slavery risks within their operations and supply chain.

This is our second voluntary Modern Slavery Statement. This Modern Slavery Statement details information about our modern slavery response during the financial year ended 30 June 2022 (**Reporting Period**).

#### How are we tracking?

We did not identify any specific instances of modern slavery harm in this Reporting Period and we have assessed our direct impact in relation to modern slavery practices remained low during the Reporting Period.

Nonetheless, we are aware that modern slavery is a pervasive and often-hidden crime that requires sustained vigilance. We will continue to develop our risk assessment methodology to identify and address areas in our operations and supply chain where modern slavery risk may exist and review and report on our risks as they evolve.



#### **Our commitment**

Bartier Perry is committed to upholding human rights and acting with integrity for our people and the wider community. As part of our commitment to respecting human rights, Bartier Perry rejects any form of slavery, forced or child labour, and works to ensure that such practices are not present in our business or our supply chains.

While we are still in the early stages of developing a robust risk assessment methodology and due diligence processes to help to identify and assess the risks of modern slavery practices within our operations and supply chains, we have made ongoing progress in our efforts to combat modern slavery since our previous report and are rolling out a new Human Rights Policy and modern slavery training to all our staff which will be captured in the next reporting period.

### OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN





Based in

Perry is a commercial law

firm with a proud 80-year

history

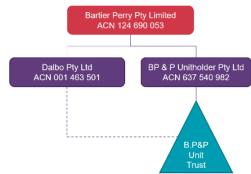
Sydney, Bartier

WHO ARE WE?

Bartier Perry Pty Limited ACN 124 690 053 is the reporting entity for this Modern Slavery Statement.

We are a commercial law firm based in Sydney with a proud 80 year history.

Bartier Perry is a private company limited by shares. Our structure remained unchanged during the Reporting Period as shown in the chart below.



#### **OUR OPERATIONS**

Bartier Perry operates out of our offices in the Sydney CBD, New South Wales.

Our operations remained unchanged since the last reporting period. We continued to directly employ staff in Australia and provide legal services to our clients.

#### Direct employment of staff

On 30 June 2022 Bartier Perry had a total workforce of 188 employees.

Bartier Perry has over 100 legal staff ranging from Partners to Paralegals and the balance of staff provide management and support services to the practice. During the Reporting Period, all our staff were employed in Australia and in accordance with Australian labour laws.



188 staff

- Legal staff (partners, lawyers and paralegals)
- Management and support staff



Everyone at Bartier Perry is provided with the **chance to make a difference** in our workplace and community

#### Provision and delivery of legal services

Bartier Perry provides personalised legal services to a range of clients from small-to-medium size enterprises, government agencies to high net worth individuals within a variety of industries including:

- Education
- Information and communications technology
- Government (Federal, State and Local)
- Fast moving consumer goods
- Finance and financial services
- Insurance
- Property, building and construction
- Charities and not-for-profits
- Hire and rental
- Private equity
- Public utilities and essential services.

Everyone at Bartier Perry is provided with the chance to make a difference in our workplace and community. Staff can get involved at many levels to champion or be part of important initiatives such as:

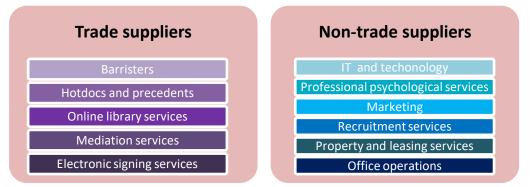


#### **OUR SUPPLY CHAIN**

The two main categories of goods and services procured during the Reporting Period remained unchanged since the previous reporting period and include:

- 1. Products and services provided by our trade suppliers and used by Bartier Perry in delivering our services
- 2. Products and services provided to Bartier Perry by our non-trade suppliers.

The goods and services procured by Bartier Perry are set out below.





During the Reporting Period, **98%** of our suppliers were based in Australia

#### **Overseas Suppliers**

During the Reporting Period, Bartier Perry engaged over 150 suppliers.

Most of the goods and services Bartier Perry procure are from suppliers and contractors based in Australia.

Our overseas supply chain during the Reporting Period included 3 suppliers who were based in Singapore, London and the Netherlands as shown in the table below.

The main products and services procured from overseas during the Reporting Period were express courier delivery services from a global supplier headquartered in the Netherlands, marketing and recruitment services via an online platform provided by a supplier headquartered in Singapore and multinational direct routing services for Microsoft Teams provided by a technology supplier headquartered in England.



# **3** OUR MODERN SLAVERY RISKS

The practices that constitute modern slavery are serious human rights violations. When multiple modern slavery risk factors co-exist, there is a higher potential or likelihood of modern slavery practices being present.

We acknowledge the identification and review of our risk areas is an essential component of human rights and modern slavery due diligence.

Bartier Perry has not identified any specific instances of modern slavery harm within its operations and first-tier supply chain.

The risk of modern slavery within our operations and the first-tier supply chain remained low during the Reporting Period. This is largely due to 98% of Bartier Perry's suppliers being headquartered in Australia, and the provision of Bartier Perry's services and the employment of our staff occurring in Australia. An overview of our assessment and the risk areas we considered are set out below.

As noted in our initial Modern Slavery Statement, given the size of Bartier Perry, we do not have the resources and capacity to assess our modern slavery risks beyond our first-tier suppliers. Notwithstanding this limitation, we intend to continue to focus our efforts on better understanding the risk areas of our operations and supply chain and identifying additional areas of modern slavery risk.

We acknowledge that there may be areas within our second and third tier supply chain where the perception of or potential for high-risk factors of modern slavery exists. These risk areas are set out below.

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#### Geographic Risk: Low

We consider the geographic risk of our suppliers to be low given 98% of our direct suppliers are based in Australia. Most of our direct overseas suppliers are based in countries which have a strong rule of law and mechanisms that protect human rights.

We acknowledge that Bartier Perry may be linked to modern slavery practices through our second and third tier suppliers that operate in, or procure goods and services from, nations that report high occurrences of labour and human rights violations and socio-economic factors like poverty and widespread discrimination.

#### Sector and Industry Risk: Low

The sectors that we deal with at Bartier Perry primarily involve the legal, not-for-profits, finance, education, government and property sectors. These sectors are heavily regulated in Australia and generally allow for reasonable visibility over lower tier suppliers.

We appreciate we may be linked to modern slavery practices further down our supply chain where some of our suppliers operate in, or are connected, to industries that involve low paying, low skilled or hazardous work, such as cleaning industries or are located in geographical areas that may have a higher risk of modern slavery.



#### Product and Services Risk: Low

Bartier Perry's core business is the provision of legal services to clients. If any of our clients were associated with modern slavery, we could inadvertently be linked to such practises through the provision of our services. This risk could be highlighted where we may not have visibility of a client's business model.

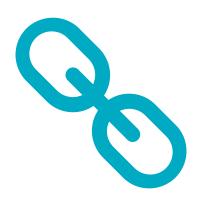
Bartier Perry procures various categories of services including cleaning, electrical, information technology, commercial kitchen appliances, installation and maintenance services in relation to carpets, doors, plans and general maintenance.

The workers in these supply chains may be from vulnerable populations, including workers from migrant, low socioeconomic or culturally and linguistically diverse backgrounds. While we consider the modern slavery risk associated with these products and services to be low in our case, the above factors elevate the risk of modern slavery practices.

#### Supply Chain Model Risk: Low

We have assessed our supply chain model risk as low based on available information. We have a moderate supply chain, with over 150 suppliers during the Reporting Period. We acknowledge the size of Bartier Perry relative to our supply chain makes it difficult to identify and monitor modern slavery practices further down our supply chain. This lack of full transparency creates a risk that Bartier Perry may be linked to modern slavery

We acknowledge that Bartier Perry may be linked to modern slavery practices through its second and third tier suppliers that operate in, or procure goods and services from, nations that report high occurrences of labour and human rights violations and socioeconomic factors like poverty and widespread discrimination.



### OUR ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS



#### Due diligence



Bartier Perry remains committed to preventing modern slavery practices in our operations and supply chains.

Given the size of our organisation and available resources, the implementation of processes to identify and track modern slavery risks within our operations and supply chains is in its early stages and is an ongoing project.

During the Reporting Period, Bartier Perry continued to employ staff within Australia and in accordance with Australian and international labour laws.

Bartier Perry seeks to ensure that we engage only with suppliers who hold the same values as us in respect of ending modern slavery practices. We continued to review our suppliers on an ongoing basis to identify any modern slavery risks.

During the Reporting Period we started to develop our supply chain mapping to identify our top suppliers in terms of spend and location. We will further develop our supply chain mapping during the next reporting period which will ultimately assist us in better assessing our modern slavery risks.



During the Reporting Period, Bartier Perry explored new offices within the Sydney CBD with the intention of moving in FY23. As part of the supplier engagement process, we actively engaged with suppliers to determine their modern slavery approach and queried suppliers on whether they were aware of any modern slavery practices within their own operations and supply chain.

We appreciate that continuous improvement is at the core of modern slavery due diligence. In this respect, we are currently reviewing our internal processes and methodology to identify how we can better identify, assess and address our modern

#### Remediation

We continued to encourage the use of our Whistleblower Policy during the Reporting Period.

Considering our risk profile during the Reporting Period, we consider our current remediation processes are effective.

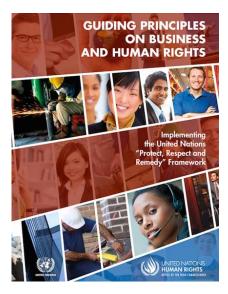


If new risks arise or our risk profile changes, we will look to updating our remediation processes to appropriately prevent or mitigate harm and its recurrence and to provide an avenue of redress for victims affected by modern slavery practices.

### ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

There has been no significant change since the previous reporting period in relation to our monitoring to assess the effectiveness of our actions. This is an area which requires ongoing attention and improvement, particularly as our business grows, we engage new suppliers, and the risks of modern slavery occurring in our supply chain and operations evolve.

We continue to be guided by the fundamental human rights due diligence principles espoused in the *United Nations Guiding Principles on Business and Human Rights*. As such, the internal reporting processes we will implement to assess the effectiveness of our actions will aim to integrate both appropriate qualitative indicators such as reviews, surveys and audits and quantitative indicators such as key performance indicators.



## 6 PROCESS OF CONSULTATION

Consultation with our group entities was not necessary in the preparation of our Modern Slavery Statement as our group entities had limited to no trading activities during the Reporting Period.

### ANY OTHER RELEVANT INFORMATION



#### Continuous improvement: looking to the future

Bartier Perry is aware that modern slavery risks are pervasive and even though our risk profile remained low during the Reporting Period, modern slavery practices and risks may present themselves further down our supply chain within the operations of our second and third tier suppliers.

We also recognise that our efforts in combatting modern slavery is an ongoing process that is constantly evolving and requires continuous improvement.

We acknowledge the importance of education and helping others to understand the risks of modern slavery. Since the Reporting Period, we made several efforts to raise awareness about the risks of modern slavery practices with our staff, clients and suppliers through:

- our modern slavery presentation delivered to local councils in August 2022
- our modern slavery articles published online and circulated to our clients
- our CEO's ESG Address which comments on the risks of modern slavery and our efforts to address those risks
- the notices published on Bartier Perry's intranet 'Birrong' which updates staff on important issues including modern slavery.

Bartier Perry remains committed to implementing a robust modern slavery framework. An overview of our top priorities for the upcoming reporting period are set out below:





For queries relating to this statement:

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#### www.bartier.com.au



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December 2022.