

# Modern Slavery Statement 2024

10 December 2024

## Introduction

This Modern Slavery Statement has been prepared by Dentons Australia Limited in accordance with the *Modern Slavery Act 2018 (Cth)* requirements. This statement relates to our activities during the 2024 financial year, from July 1, 2023, to June 30, 2024 and was approved by Dentons' Board of Directors on 10 December 2024.

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

## Our business

Dentons Australia Limited is an incorporated legal practice providing legal services to businesses and individuals in Australia and, through its related entity Dentons PNG, Papua New Guinea (**Dentons**).

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

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 as well as 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. Given that 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, supplier due diligence, social impact, whistle-blower protections as well as a supplier code of conduct as set out in our Modern Slavery Policy. All policies are reviewed and, where necessary, updated on a regular basis.

## Assessment of modern slavery risks

Dentons continues to assess risk and carry out due diligence on all relevant and appropriate suppliers by asking for information on their policies and specific questions designed to identify modern slavery risk. This information helps us to establish what potential mitigation strategies suppliers have in place and, in turn, helps us understand our exposure to modern slavery risks. This process is designed to assist our organisation to continue to develop strategies to mitigate current and future risks. Our assessment takes into account the primary modern slavery risk indicators including the goods and services supplied, high risk sectors or industries, geographic and entity-specific risks.

Our suppliers that present a higher level of risk are 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 are informed of our commitment to the eradication of modern slavery and are provided with opportunities for further engagement.

Our supplier code of conduct has been designed to share our procurement principles with our suppliers and to clearly communicate the behaviours and business practices to which we expect suppliers to adhere.

## Our actions

The outcomes from our proposed actions in FY23/24 are listed in the table below together with Dentons planned actions for FY24/25:

Outcomes	FY24/25 planned actions
<p>Dentons' Modern Slavery Policy was reviewed by the Board on 10 December 2024.</p> <p>Dentons introduced a new online web application designed to streamline the management of Dentons 'policies. This innovative platform serves as a central repository for all approved policy documents, procedures, forms, and guidelines and ensures compliance in our annual review.</p>	<p>Dentons will continue to ensure our Modern Slavery Policy is reviewed annually and improvements made, if required.</p>
<p>Our Modern Slavery working group continued to meet regularly throughout this year and:</p> <ul style="list-style-type: none"> <li>• undertook an annual review of our modern slavery risk assessment methodology.</li> <li>• reviewed existing policies including our supplier questionnaire concerning modern slavery to ensure they continue to mitigate our exposure to modern slavery and human rights risks.</li> <li>• shared new developments, including articles in relation to modern slavery reporting and developments under the Modern Slavery Act 2018.</li> <li>• discussed and resolved concerns when clarification was required.</li> </ul>	<p>Dentons Modern Slavery working group will continue to meet to:</p> <ul style="list-style-type: none"> <li>• undertake an annual review of our modern slavery risk assessment methodology.</li> <li>• review existing policies concerning modern slavery to ensure they continue to mitigate our exposure to modern slavery and human rights risks.</li> <li>• share new developments in modern slavery reporting under the <i>Modern Slavery Act 2018</i>.</li> <li>• ensure any identified risks and concerns are brought to the attention of senior personnel and a response plan is followed.</li> <li>• identify and implement improvements in our supplier procurement engagements to address modern slavery risk.</li> </ul>
<p>We improved our supplier due diligence practices through a comprehensive supplier onboarding process that captured and assessed relevant organisational information.</p> <p>We also continued to build a comprehensive risk profile across our supply chain.</p> <p>We did not complete our enhanced due diligence practices on technology companies, with a focus on those who identified offshore component manufacturers in their supply chains but intend to do so in the near future.</p>	<p>Dentons will continue to further enhance our due diligence practices across all industries.</p> <p>We will complete our focus on technology companies who have identified offshore component manufactures in their supply chains.</p>
<p>We continued to educate our employees by rolling out our internal online training annually to all existing staff and ensuring all new staff completed the training through our induction program.</p>	<p>Dentons will continue to roll out our internal online training annually to all existing staff and ensure all new staff complete the training through our induction program.</p>

Outcomes	FY24/25 planned actions
We prepared training for the Dentons Board of Directors on modern slavery risks and reporting requirements which included an online training module recorded on 21 March 2024 entitled “Modern Slavery compliance in Australia – what this means for our clients (and us!)”	Dentons will provide the prepared training to Dentons’ Board about modern slavery risks in our supply chain.
We educated our suppliers of our commitment to addressing modern slavery risks by offering our suppliers access to our online training module.	Dentons will continue to educate our suppliers of Dentons commitment to addressing modern slavery risks via our Modern Slavery Questionnaire, Supplier Code of Conduct and offering our suppliers access to our online training.
Dentons implemented a third-party risk management application to assist us to manage end to end risk assessment and management of our data of our current and future supplier engagements.	Dentons will continue to utilise our online third-party risk management application to ensure end to end risk assessment and management of data.

### Measuring our effectiveness

Our enhanced procurement and supplier due diligence process has enabled Dentons 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.

Dentons can now measure its program’s effectiveness through the employee’s completion rate of training modules, as well as the ability to confidently challenge and educate our suppliers.

Dentons’ Modern Slavery Working Group, continued to meet regularly throughout the year, to measure the effectiveness of our strategies and review our priorities and performance. The group continues to make improvements to the process for Dentons’ engagement with our suppliers and identifying and responding to modern slavery risks within our business.

Dentons is a member of the Australian Legal Sector Alliance (AusLSA) Modern Slavery Co-Lab. The Modern Slavery Co-Lab was formed by AusLSA to help its members manage their modern slavery objectives and obligations. The Modern Slavery Co-Lab provides:

1. a confidential and collaborative environment for law firms to share experience with other modern slavery practitioners.
2. information, advice, case studies and potential solutions to address key issues to improve the impact of modern slavery programs.
3. a forum for considering the ongoing issues and challenges in relation to modern slavery and developing longer term approaches to the risks it poses.

Dentons has implemented an online third-party risk management application, to help us to ensure end to end risk assessment and management of data.

### Consultation within our group

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

A handwritten signature in black ink, consisting of a stylized, cursive 'D' followed by a horizontal line.

Doug Stipanicev

**Australasia Region CEO**

Dentons Australia Limited