

# Modern Slavery Statement

Australia 2023

*We would like to acknowledge the traditional custodians of the lands on which we live and work. We would like to pay respect to the Elders of these lands, both past and present, and extend that respect to all Aboriginal and Torres Strait Islander Peoples and First Nation Peoples globally.*

This statement is made on behalf of Norton Rose Fulbright Australia (ABN 32 720 868 049) and Norton Rose Fulbright Australia Services Pty Ltd (ABN 51 091 227 486) pursuant to section 14 of the *Modern Slavery Act 2018 (the Act)* and constitutes our modern slavery statement for the financial year ended 30 June 2023 (**Reporting Period**). Where we refer to "NRFA", "we", "us", "our" or the "firm" in this statement, it means Norton Rose Fulbright Australia, Norton Rose Fulbright Australia Services Pty Ltd and other entities owned or controlled by Norton Rose Fulbright Australia Group Pty Ltd as trustee for the equity partners of Norton Rose Fulbright Australia.

Our Business Principles of Quality, Unity and Integrity underpin our culture, the way we work and what we stand for. We value our people and are committed to maintaining an environment where individuals feel safe and respected.

This statement illustrates how we apply our Business Principles in practice, and reflects our continued public commitment to assess, prevent and address the risks of forced, compulsory, trafficked or child labour within our organisation and in our supply chains.

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## Our structure, operations and supply chains

We have offices across Australia, in Brisbane, Canberra, Melbourne, Newcastle, Perth and Sydney.

Norton Rose Fulbright Australia provides legal and advisory services to clients, while Norton Rose Fulbright Australia Services Pty Ltd provides ancillary services to support the activities of Norton Rose Fulbright Australia. Norton Rose Fulbright Australia Holdings Pty Ltd has a number of subsidiaries, which are non-trading and do not have employees.

Norton Rose Fulbright Australia, Norton Rose Fulbright US LLP, Norton Rose Fulbright LLP, Norton Rose Fulbright Canada LLP and Norton Rose Fulbright South Africa Inc are separate legal entities and all of them are members of Norton Rose Fulbright Verein, a Swiss verein. Norton Rose Fulbright Verein helps coordinate the activities of the members but does not itself engage in the practice of law or other business.

We also have associations or alliances with other organisations such as the law firms Jaramer Legal (in which we also have a minority shareholding) in Australia and TNB & Partners in Indonesia. Jaramer Legal is Australia's first national majority Indigenous-owned law firm that provides a broad suite of corporate and commercial legal services. TNB & Partners is a law firm based in Jakarta that provides legal services in corporate and commercial, banking and finance and dispute resolution.

Our principal activity is the provision of legal and advisory services to business enterprises, governments and other public sector organisations. We are focused on six key industry sectors:

- consumer markets;
- energy, infrastructure and resources;
- financial institutions;
- life sciences and healthcare;
- technology; and
- transport.

Our total head count is approximately 857 comprising 516 females and 341 males. Our workforce predominately comprises legal professionals, supported by embedded business services, technology, finance, legal operations, payroll, administrative and HR teams. The majority of our workforce is engaged on an ongoing basis. We utilise a very small pool of contractors, casuals and external

consultants. In addition to the National Employment Standards described further in point (c) in Annexure A of this Statement, staff salaries are reviewed annually against the local market data for their role, and the market data is provided by Mercer twice annually. For staff covered by an Award, they are paid above the minimum Award rate under the Legal Services Award.

Our suppliers include suppliers of IT and communications equipment and services; real estate and related services such as office cleaning and other facilities management services; food and beverages services, transport such as airlines and couriers; marketing such as merchandise suppliers and conference providers; office equipment and supplies; and professional services such as auditors, accountants, consultants, legal counsel, banks, insurers, recruitment agencies, education and training service providers and medical services providers. We also have some suppliers that provide legal or other services which are used by us in the provision of services to our clients, primarily barristers. Our suppliers are primarily domiciled in Australia, but also include global entities that supply Norton Rose Fulbright globally.

The geographic footprint representing where suppliers have business operations is shown below. It includes the locations in respect of the suppliers that completed our Modern Slavery Questionnaire (MSQ) in 2023.



## Modern slavery risks in our operations and supply chains

### Our operations

As set out in the UN Guiding Principles on Business and Human Rights (**UNGPs**), business enterprises have a responsibility to respect internationally recognised human rights. The responsibility to respect human rights requires that business enterprises: (a) avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur; (b) seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.

In applying the lens of the UNGPs, we have assessed the potential for our operations to cause, contribute to, or be directly linked to adverse human rights impacts, including modern slavery. For the reasons described in this statement and summarised below, we remain of the view that there is low risk that our operations have caused or contributed to adverse human rights impacts:

- We follow set protocols in the way we recruit people into the firm via our recruitment practices. For example, we verify qualifications, conduct reference checking on prior experience, and verify the right to work in our country.
- We continue to monitor and engage with our staff on issues such as work hours and overtime, to ensure they are adequately compensated and we monitor excessive work patterns.
- We have policies and procedures to ensure that our workplace is free from discrimination based on gender, race, ethnicity, sexual orientation or any other status as set out in the Universal Declaration of Human Rights and other international human rights treaties and declarations.

For the reasons summarised below, we also remain of the view that the risk of our being directly linked to adverse human rights via our business partners in our operations is low:

- Given the nature of its services and the jurisdiction in which it operates, the level of risk of modern slavery in Jarmer Legal's operations remains low.

- With respect to TNB & Partners, although Indonesia is a higher risk jurisdiction for modern slavery than Australia, we do not consider our association with that law firm links us to human rights impacts. This is because of the nature of the professional legal services provided by TNB & Partners.

### Supply chains

In applying the lens of the UNGPs, we have assessed the potential for our procurement activities to cause, contribute to, or be directly linked to adverse human rights impacts, including modern slavery. Given the nature of our procurement categories and practices as described in further detail below, it is unlikely that we have caused or contributed to modern slavery in our procurement of goods or services during the Reporting Period.

While our supply chain profile remains largely the same year-on-year, we list below the key categories of goods and services that we use in our business. We also provide a general description of the key modern slavery risks that are likely to exist in each of those categories by virtue of the industry risk profiles and provision of goods or services.

Category	Generally known modern slavery risks <sup>1</sup>
IT equipment and software	Forced labour and the worst forms of child labour are present in the supply chains that provide IT companies with the necessary raw materials to produce electronic goods, and parts of those goods. As reported in the 2022 report by the Bureau of International Labor Affairs ( <b>ILAB</b> ), the manufacture of electronics has been associated with labour exploitation, including child labour and forced labour. <sup>2</sup>

<sup>1</sup> The risks outlined in this table are general and do not relate to any actual instances of modern slavery in the supply chain of our first-tier suppliers.

<sup>2</sup> [https://www.dol.gov/sites/dolgov/files/ILAB/child\\_labor\\_reports/tda2021/2022-TVPR-List-of-Goods-v3.pdf](https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2021/2022-TVPR-List-of-Goods-v3.pdf)

Category	Generally known modern slavery risks <sup>1</sup>	Category	Generally known modern slavery risks <sup>1</sup>
Cleaning services and facilities maintenance	<p>The cleaning industry is considered a higher risk industry for forced labour and debt bondage due to factors such as employers withholding wages, excessive working hours, complex and opaque subcontracting arrangements, and workers on temporary visas with limited bargaining power and awareness of their rights at work.</p> <p>Similar to the cleaning sector, the prevalence of subcontracting in the facilities maintenance industry can lead to contractual liabilities and obligations diminishing to the point where the human rights of workers on site may go unnoticed due to a lack of transparency.</p>	Furniture	There are increased modern slavery risks associated with producing and sourcing raw materials such as timber, bricks, PVC in flooring, fabrics, metals and glass as well as risks in the manufacturing industry located in countries with a greater prevalence of, and vulnerability to, modern slavery.
Hospitality and food services	<p>Food related supply chains have a high risk of modern slavery, including forced labour, child labour and debt bondage due to the reliance on ingredients sourced globally, often from countries with a higher prevalence of, and vulnerability to, modern slavery. For example, coffee, tea, cocoa, rice, palm and derivative products and seafood are some of the many products linked to child and forced labour.<sup>3</sup></p> <p>The hospitality and food services industry, irrespective of jurisdiction, has elevated risks driven by parallel factors described above in relation to the cleaning sector.</p>	Travel services	Although global travel management services are typically the first-tier suppliers for large companies, hotels and airlines and their contracted and labour hire workers providing base-skilled labour inevitably form part of the supply chain for purchasers of travel services. A vulnerable workforce supporting these industries combined with complex supply chains contribute to increased modern slavery risks.
Corporate merchandise	Mass-produced items and garments, particularly if produced in countries with a greater prevalence of, and vulnerability to, modern slavery, have a higher risk of child labour and forced labour. Textiles, cotton and garments are listed in ILO's 2022 list of goods produced by child labour and forced labour.	Postal and courier pick-up and delivery services	The prevalence of subcontracting and labour hire places the suppliers in this category at greater risk of being directly linked to modern slavery. For example, in the 2022 modern slavery statement of one of our main suppliers in this category, they identified the risks associated with having an extended workforce of over 27,000 with whom they do not have a direct employment relationship.

Based on the information gathered via our modern slavery questionnaire, our suppliers manufactured or procured goods and/or services from a range of countries including Australia, the United States, the United Kingdom, Singapore, China and India. Of these countries, the Fund for Peace Fragile States Index Annual Report 2022 scored China 9.7 out of 10 and India 7.4 out of 10 for human rights and the rule of law.<sup>4</sup>

Although these figures are not direct measurements of the prevalence of modern slavery, they provide insights into the conditions in which adverse human rights impacts, including modern slavery, can exist.

<sup>3</sup> [https://www.dol.gov/sites/dolgov/files/ILAB/child\\_labor\\_reports/tda2021/2022-TVPRA-List-of-Goods-v3.pdf](https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2021/2022-TVPRA-List-of-Goods-v3.pdf)

<sup>4</sup> Fund for Peace (FFP), 'Fragile States Index Annual Report 2022' < [951 22 Report REV.pub \(fragilestatesindex.org\)](https://www.fragilestatesindex.org) >. Note that the lower the score, the better ranked the country is based on FFP's scoring methodology.

## Due diligence process and steps taken to assess and manage modern slavery risk

As a provider of legal services, a purchaser of goods and services and also an employer, we recognise our responsibility under the UNGPs to respect human rights in all areas of our practice. Accordingly, we continue to assess and adopt measures to mitigate modern slavery risks across three levels of our business, namely, operations, client services and supply chain. Our existing policies and procedures are set out in [Annexure A](#). During the Reporting Period, the policies and procedures were operational.

### Our operations

During the Reporting Period, we continued to implement measures to mitigate against modern slavery risks. An overview of the actions we have taken to assess and manage modern slavery is set out below:

- We continued to monitor the reports made via our **whistleblowing channels** and confirm that we did not receive any reports of actual or suspected violations of our Human Rights Policy or which otherwise gave rise to cause for concern relating to human rights during the Reporting Period.
- We **communicated** with our people to recap our firm's commitment to respecting human rights in our operations and supply chain. Approximately 87.3% of all staff in Australia (up by 10% from the previous year) completed the mandatory online Human Rights Training designed to increase awareness of how to recognise red flags for modern slavery.

### Client services

As stated in our Human Rights Policy, we continue to assess potential human rights impacts and consider these when opening new client matters. All new clients are subject to checks that identify any high-risk industries in which they operate. We review clients' annual reports where available, conduct internet searches and use a subscription database to identify financial crime convictions and adverse media reports. If a client's industry is regarded as high risk for human rights issues, our searches are more extensive.

During the Reporting Period, the due diligence performed by our Compliance team led to decisions to decline potential engagements due to adverse human rights impacts. For example, we declined two engagements pertaining to the right to privacy.

Our General Counsel team continued to monitor the responses to our internal monthly email seeking disclosure of any circumstance of breach of our Human Rights Policy, as well as any cause for concern relating to human rights in any part of our supply chain. Our partners and senior lawyers have not raised human rights issues in relation to our client services (or our supply chain) during the Reporting Period.

Through our advisory work and the sharing of best practice between our Business Human Rights team, Environmental, Social and Governance team and our other practice areas, we have continued to support our clients' understanding of human rights issues and impacts, including modern slavery.

Our Business Human Rights subject matter experts have presented at numerous roundtables and webinars for clients and external audiences in relation to modern slavery, human rights due diligence and best practice. We have also published articles and legal updates where we explain various regulatory developments (see link [here](#)). This education role is part of our commitment to improve the understanding of the responsibility of business to respect human rights.

In addition to our ongoing efforts to raise awareness of modern slavery risks, many of our clients have sought our participation in their supply chain due diligence efforts. During the Reporting Period, we continued to cooperate with the risk assessment measures requested by our clients as and when required. In recognition that we form part of supply chains of other reporting entities, we responded to modern slavery questionnaires issued to us by our clients and when engaging with clients on new matters we provided details of our human rights due diligence and other information regarding our modern slavery risk profile.

### Pro bono practice

We have also contributed to upholding human rights, and more specifically preventing modern slavery, via the work that we have undertaken with our clients in our pro bono practice this year. Our engagements have included continuing to advise the Clean Energy Council (**CEC**), on a pro bono basis, in relation to identification and management of the risks of modern slavery in the renewables sector and facilitating its Modern Slavery Working Group. We also assisted Anti-Slavery Australia (**ASA**) with an in-depth comparative research paper on human trafficking visa frameworks across the globe. In addition, two of our

lawyers completed a six-month secondment to ASA and another previous secondee continues to volunteer on a weekly basis for the organisation.

We continue to assist International Justice Mission Australia (IJM) on a pro bono basis. During the Reporting Period, we provided IJM with research assistance related to its submissions to the review of the Act and the review of Divisions 270 and 271 of the *Criminal Code Act 1995* (Cth). Division 270 criminalises slavery and slavery-like practices including servitude, forced labour, deceptive recruiting, debt bondage and forced marriage. Division 271 contains specific offences for trafficking in persons.

Modern slavery continues to remain a key focus area of our pro bono strategy. The firm continues to work on pro bono projects and place secondees at non-profit organisations tackling modern slavery.

## Supply chain

Our core procurement processes for assessing and managing modern slavery and human rights impacts have remained stable for a number of years. We continued to use the MSQ on the Ethixbase360 platform as a key part of our modern slavery due diligence program. We continued to train our staff with a procurement function on the application of our Supplier Contracts Policy and the process by which we conduct modern slavery due diligence on new suppliers at onboarding via the Ethixbase360 platform. This training is mandatory for all staff with a procurement function.

In summary, our due diligence process required:

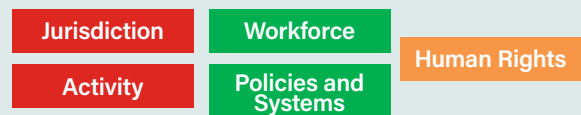
- the consideration of the human rights impacts of a supplier's provision of goods or services to us both at the time of first selecting the supplier and upon renewal or extension of the contract with the supplier;
- all suppliers to confirm in writing their compliance with our Supplier Charter or an equivalent document (for example, the supplier's own supplier charter) that is approved by our General Counsel. Our Supplier Charter sets out our expectations of suppliers in respect of anti-bribery and corruption, diversity and inclusion, health and safety, sustainability and human rights. In respect of human rights, it provides that our suppliers, whether directly or through their supply chain, must comply with all applicable human rights related laws in respect of their employees; conduct their business activities in a manner which respects human rights as set out in the

UN Universal Declaration of Human Rights and the core conventions of the International Labour Organization; not hold another person in slavery or servitude, employ, engage or otherwise use forced or compulsory labour, trafficked labour or child labour; and not engage in or condone the use of corporal punishments or mentally, physically or sexually abusive or inhumane treatment of workers; and

- that suppliers meeting our internal procurement annualised spend threshold, and all suppliers providing goods and/or services relating to courier services, food and food related goods and services and/or cleaning services, complete an online MSQ.

## Print management

During the Reporting Period, one of our print management providers returned a moderate risk rating on the MSQ due to a combination of the higher risk jurisdiction in which they have operations and the inherent industry risk pertaining to manufacturing, printing and print support services. A breakdown of the risk in the five key areas assessed via the MSQ is shown below using the traffic light system, with red denoting high risk, amber denoting moderate risk and green for lower risk:



We contacted the supplier to find out more about the measures they have in place to mitigate the risks of modern slavery in their operations and supply chains. The supplier informed us that they have a modern slavery policy in place, together with a supplier code of conduct and supplier audit processes. The modern slavery policy contained information regarding the company's active Sedex membership, training program on responsible sourcing and supplier due diligence processes. The supplier code of conduct contained requirements relating to working hours, wages and benefits, and child labour and young workers. Upon review of the information provided, we were satisfied that the supplier was taking measures commensurate to the size of the business to assess, prevent and mitigate the risks of modern slavery in their operations and supply chain.

We performed a process of assurance to assess compliance with our procurement policies and procedures in relation to the goods and services procured by the Marketing and Business Development (**MBD**) team during the Reporting Period. Undertaking assurance checks is an important part of ensuring our systems are effective. We observed some minor gaps in compliance with policies and procedures, mainly relating to sending MSQs at supplier onboarding and knowing when suppliers reach the accumulated spend threshold during the course of the year. We will consider how best to close out this gap and provide training to improve compliance.

The average modern slavery risk rating for suppliers that completed the MSQ remained low. No supplier that completed the MSQ was given a high risk rating. The suppliers that received a moderate risk rating operated predominately in Australia but had operations in, or sourced products from, a higher risk jurisdiction. The jurisdiction risk, combined with inherent sector risk, were contributing factors to the moderate risk rating.

## Office cleaners

Our offices and facilities are one of our most significant categories of expenditure and hold some of the more salient risks of modern slavery in our supply chain. Cleaning work in particular is a higher risk services sector where multiple tiers of contracting often obscure labour conditions, and the base-skilled nature of work can result in workers being exploited.

During the Reporting Period, we continued our engagement with our landlords on the measures they had in place to assess, prevent, mitigate and address the risks of modern slavery in the office cleaning workforce. We reviewed the further material provided by landlords, including self-assessment questionnaire responses provided by their subcontractors, to better understand the risks beyond the first tier and to gain visibility in relation to how our landlords cascaded mitigating measures to their suppliers. We see our engagement with the landlords on the topic of modern slavery as an ongoing discussion.

We developed a 'Speak Up' poster to be positioned in locations with high foot traffic, to raise awareness of modern slavery together with ways to raise concerns and/or seek support.



## Assessing the effectiveness of our actions

In our fourth year of reporting pursuant to the Act, we have continued to assess the effectiveness of our actions by reference to the goals we set for the next reporting period and tracking our progress against those goals.

We will continue to review, monitor and embed our processes by progressing the following goals:

Goal	FY23 progress and next steps
Assess the number of our suppliers which have adopted a human rights or modern slavery commitment, whether by agreeing to our Supplier Charter or otherwise	All suppliers who completed the MSQ agreed to comply with our Supplier Charter. We will continue to monitor supplier responses to our question on compliance with our Supplier Charter.
Identify the suppliers requiring further due diligence following the MSQ results and develop remediation plans in conjunction with the supplier(s) as and when required	We conducted further due diligence with our provider of print management services and continued our discussions with landlords in relation to modern slavery risks in the cleaning services provided on our premises. We will review the MSQ results from the next reporting period and assess the need to conduct any additional deep dives.
Continue to monitor the reporting channels for any reported instances of human rights impacts in our operations and supply chains	We will continue to monitor our reporting channels for any concerns raised relating to adverse human rights impacts, including modern slavery.

Goal	FY23 progress and next steps
Continue to provide the mandatory training for staff with a procurement function to properly apply our Supplier Contracts Policy and in respect of the use of the Ethixbase360 platform to conduct modern slavery due diligence on new suppliers	We continued to provide the necessary training to ensure that our staff are equipped with the knowledge and skills to implement our policies and procedures. We will continue to provide training to all staff with a procurement function.
Analyse the results of the review of data of payments paid to suppliers as against suppliers uploaded to the Ethixbase360 platform to identify where there are process gaps resulting in suppliers bypassing the MSQ requirement	We conducted an assurance process as described earlier in this statement. We will continue to perform this reconciliation process annually.
Assess the results from the MSQ responses in the previous reporting periods to ascertain patterns, trends and changes in risk profiles	We will continue to monitor the MSQ results year on year.
Update the Human Rights Training content and review the Human Rights Policy	We developed updated training which will be rolled out in the next Reporting Period.
Update precedent clauses on modern slavery and human rights to take into account emerging and evolving risks	We continue to update the modern slavery and human rights boilerplate clauses periodically to align with best practice.

## Other information

### Engagement in the business and human rights community

We remain committed to the sharing and dissemination of our knowledge and expertise in the area of business and human rights in order to promote capacity building amongst our clients as well as more widely in the market.

In August 2022, the Attorney-General's Department published an Issues Paper to initiate a three-month public consultation period on the review of the Act. We filed our submission<sup>5</sup> with suggestions on improvements to the Act and met with Professor John McMillan AO, who conducted the review, to discuss ways to strengthen the Act.

One of our consultants, Greg Vickery AO, sits on the Expert Advisory Committee set up by the Attorney-General's Department to provide expert advice to government on the operation of the Act, as well as strengthening compliance with the Act. Abigail McGregor and Greg Vickery AO are members of the Law Council of Australia's Business and Human Rights Committee (which Greg chairs) and the Foreign Corrupt Practices Working Group.

Greg Vickery AO participated in the UN Global Forum on Business and Human Rights. This forum is held annually in Geneva and Norton Rose Fulbright regularly hosts a session on key topical issues. We also facilitated the Modern Slavery Working Group of the CEC, as outlined above as part of our collaboration with businesses.

### Our sustainability approach

As part of a global firm, we seek to play our part in addressing some of the urgent challenges involved in halting climate change and protecting biodiversity. Over the past few years, there is a growing body of evidence linking supply chains for renewable energy products to modern slavery. The main points of exposure include the manufacture of components and the extraction of raw materials. In November 2022, we published a white paper in collaboration with the Clean Energy Council to explore a range of possible strategies to address the renewable energy sector's exposure to modern slavery.<sup>6</sup>

In the Reporting Period, we continued to explore the changing Environmental, Social and Governance (ESG)/sustainability landscape of which business human rights forms an indivisible part. It is becoming increasingly important to view the sustainability agenda holistically and deal with all its component parts, including human rights.

## Consultation and approval

This statement was prepared by our General Counsel team and our modern slavery subject matter experts, who have consulted with partners, employees and contractors of both Norton Rose Fulbright Australia and Norton Rose Fulbright Australia Services Pty Ltd. Norton Rose Fulbright Australia's Australian Partnership Council approved this statement on behalf of the partners of Norton Rose Fulbright Australia on 20 November 2023, and the board of directors of Norton Rose Fulbright Australia Services Pty Ltd approved this statement on 5 December 2023. Annexure B sets out the page references within this statement addressing the mandatory reporting criteria.



**Alison Deitz**

**Chief Executive Partner**

(Norton Rose Fulbright Australia)

and

**Director**

(Norton Rose Fulbright Australia Services Pty Ltd)

December 2023

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<sup>5</sup> [https://consultations.ag.gov.au/crime/modern-slavery-act-review/consultation/view\\_respondent?uuld=983750889](https://consultations.ag.gov.au/crime/modern-slavery-act-review/consultation/view_respondent?uuld=983750889)

<sup>6</sup> <https://assets.cleanenergycouncil.org.au/documents/resources/reports/Addressing-Modern-Slavery-in-the-Clean-Energy-Sector.pdf>

## Annexure A

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### Existing policy or procedure

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- a) All partners and staff are expected to comply with our **Business Principles** of Quality, Unity and Integrity as well as any relevant laws and professional codes of conduct applicable to us. These ethical principles are embedded in employment contracts and supported by our policies as set out in our intranet, and are communicated to new employees on commencement.
- b) Our **Human Rights Policy** articulates our commitment to respecting internationally recognised human rights under the UN Guiding Principles, the International Bill of Human Rights and the ILO Declaration. It also sets out our expectations for the conduct of our business partners.
- c) We recognise that one of the fundamental human rights is the right to an adequate living wage. Norton Rose Fulbright Australia provides at least the minimum entitlements called the **National Employment Standards** to all its full-time and part-time employees. For those employed under the Legal Services Award 2020 (LSA), we ensure compliance with the minimum pay and conditions as set out in the award. We comply with the minimum wage standards applicable to each of our offices and there is a regular process in place to monitor compliance.
- d) We have an established **remuneration framework** which is designed to ensure our people are paid fairly, competitively and based on merit. Our remuneration framework is structured to reward people for their individual and collective contribution to our success, for demonstrating our values and for creating value for the firm, our clients and stakeholders.
- e) In our efforts to address the human rights risk of **excessive working hours**, our People and Development team reviews excessive hours and overtime hours and provide any necessary support to employees to manage their workload.
- f) We recognise that diversity and inclusion is a critical business issue. We aim to leverage the rich diversity of our people in order to provide better service to our clients now and into the future. We value difference and the variety of perspectives that this brings to the firm. We have a well-developed **diversity and inclusion policy and program** - and promote a diverse workforce and an inclusive culture.
- g) The right to feel safe in our workplaces is another enshrined human right. We take a zero tolerance approach to sexual harassment and indeed any form of harassment, discrimination or bullying. Our policies reflect this stance and every member of our firm has the right to feel respected and safe. Our **policies relating to equal employment opportunity (EEO), discrimination and harassment, and Appropriate Workplace Conduct and Issues and Complaints Resolution Procedure** are some of the documents that ensure our staff understand the workplace conduct expected of them and the procedures available to seek support. These policies are supported by a mandatory e-learning module, Fostering a Respectful Workplace (released in July 2020 and subsequently updated), covering a variety of topics such as discrimination, harassment, bullying, sexual harassment and other inappropriate behaviour.
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**Existing policy or procedure**

- h) A **mental health risk assessment** was also developed to identify hazards and control measures to respond to heightened stress, anxiety and other mental health challenges caused and/or exacerbated by the pandemic. A range of additional mental health initiatives has been offered to support employees, including wellness surveys, a dedicated wellness portal (providing mental health resources and tips) and a wellness training program.
- i) Our client and matter induction process is extensive and it takes potential risks relating to human rights into consideration. Compliance officers, including those in our Australian **Client Due Diligence (CDD)** team, have been trained to extend their Know Your Client (KYC) screening to include the human rights record of, amongst other things, the client, counterparties and any relevant jurisdiction(s).
- j) The Modern Slavery Questionnaire (**MSQ**) was developed by our Business Human Rights group in 2018 to promote more ethically sustainable sourcing practices and to streamline the process of assessing modern slavery risk in our own supply chain. It is a cloud-based solution that brought together powerful analytics, our global human rights expertise and user-friendly design to identify and manage supply chain risk. Through the MSQ process, suppliers are allocated a modern slavery risk rating which then provide the groundwork for informing the actions to be taken. In July 2020, the MSQ was licensed to Ethixbase.
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## Annexure B

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	Mandatory criteria	Page number/s
a)	Identify the reporting entity.	1
b)	Describe the reporting entity's structure, operations and supply chains.	3
c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	4-5
d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	6-8
e)	Describe how the reporting entity assesses the effectiveness of these actions.	9
f)	Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	10

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