

Modern Slavery Statement

FY23

About this Statement

This Modern Slavery Statement (**Statement**) is made by Slater & Gordon Ltd (ABN 93 097 297 400) and each of its wholly owned operating subsidiaries (together **Slater and Gordon** and jointly referred to as **the Group**) under the *Modern Slavery Act 2018* (Cth) (**Act**) for the financial year ending 30 June 2023 (**FY 2023**).

The Slater and Gordon business operates through various legal entities. These separate entities largely reflect historical asset acquisitions, the structures of which have been retained for legal/tax/accounting purposes only.

The overall business functionality of the Slater and Gordon business is overseen by the Board of Directors and Executive Leadership Team of Slater & Gordon Ltd. The vast majority of supplier contracts are entered into by Slater & Gordon Ltd.

This Statement is a consolidated description of the actions taken to address modern slavery risks by the Slater and Gordon Group as a whole.

The Board of Directors of Slater & Gordon Ltd (as the head company of the Group) has reviewed and approved this Statement for publication as a joint statement of all reporting entities in the Slater and Gordon Group in accordance with section 14(2)(d)(ii) of the Act.

This Statement has been prepared to meet the mandatory reporting criteria set out under the Act. The table below identifies where information relating to each of the mandatory reporting criteria can be found in this Statement:

Reporting Criteria	Heading and page reference
Identify the reporting entity	About this Statement: page 1
Describe the reporting entity's structure, operations and supply chains	Our Structure, Operations and Supply Chain: page 2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity	Modern slavery risks within our operations and supply chain: page 3
Describe actions taken to assess and address these risks, including due diligence and remediation processes	Actions to assess and address modern slavery risks: page 6 Effectiveness of actions: page 7 Looking Forward: page 8
Describe the process of consultation with entities you own or control	Consultation: page 7 Approval: page 8
Provide any other relevant information	Overview: page 2 Looking Forward: page 9

Overview

As a law firm built on social justice values, Slater and Gordon has a long and proud history of championing the rights and entitlements of people who need our help. Slater and Gordon respects the fundamental rights of all human beings, including the right to freedom from modern slavery of any kind.

Slater and Gordon is committed to safe workplaces and to limiting the risk of modern slavery within its own business and supply chains. Slater and Gordon is also committed to continuously improving strategies to identify and mitigate modern slavery and ethical sourcing risks.

This Statement provides details of the steps we have taken to address and mitigate the risk of modern slavery both within our business and in our supply chain.

While we continue to make progress, we recognise that there is more work to be done in the eradication of modern slavery practices worldwide and therefore commit ourselves to addressing that task, recognising that it will be a continuous process of improvement. In pursuing this goal, we know that the steps we take today will help to build a better tomorrow.

Our structure, operations and supply chain

Founded in 1935, Slater and Gordon is a leading Australian consumer law firm providing specialist legal and complementary services in a broad range of areas, including:

- Personal Injury
- Superannuation and Insurance
- Class Actions
- Employment Law

Our services are provided by Australian registered lawyers from our Australian offices and we are regulated by State based statutory bodies and professional associations.

We service approximately 40 locations throughout Australia, and our operations are conducted primarily by Slater & Gordon Ltd (ACN 097 297 400), an unlisted public company. Slater & Gordon Ltd was the subject of a successful off market takeover bid from certain funds managed by Allegro Funds Pty Ltd which resulted in the Company being delisted from the Australian Stock Exchange on 28 April 2023. Neither the change in ownership nor the delisting materially impacted the Group's operations.

In addition, Slater and Gordon operates through the following reporting entities, all of which are wholly owned subsidiaries and each of which is subject to the direct influence and control of Slater & Gordon Ltd:

- Slater & Gordon Lawyers (NSW) Pty Ltd (ACN 119 864 881)
- SG NSW Pty Ltd (ACN 161 483 414)
- All States Legal Co Pty Ltd (ACN 125 001 818)
- Slater and Gordon (TML) Queensland Pty Ltd (ACN 128 949 753)
- Schultz Toomey O'Brien Lawyers Pty Ltd (ACN 136 676 714)
- Conveyancing Works (Qld) Pty Ltd (ACN 127 912 074)

All subsidiaries were acquired via historical M&A activity and currently operate in “run-off” mode only, to finalise the legal matters of legacy clients (no new business is being entered into by any of these entities). Whilst the subsidiaries each have their own boards, none of the subsidiaries employ any staff directly or undertake any significant procurement activity (other than engaging professional advisers to progress the resolution of clients’ claims). The overwhelming majority of the Group’s procurement activity is undertaken by the head company.

Slater and Gordon’s supply chain predominantly consists of goods and services acquired to assist in the delivery of legal services. By spend, our largest suppliers are our financiers, litigation funders and other professional service providers: in this regard we work in conjunction with barristers, other law firms, legal, medical and other subject matter experts who are engaged on behalf of our clients to assist with the progression of our clients’ legal matters.

In addition, our supply chain includes the physical premises we occupy, facilities we use (photocopiers, office supplies, etc), branded products used for promotional purposes, maintenance contracts, software licences and IT infrastructure.

Modern slavery risks within our operations and supply chain

As a highly regulated professional legal services business whose workforce is employed solely in Australia, there is negligible risk of modern slavery within our direct business operations. In addition, the legal sector is generally assessed as being low risk for modern slavery¹.

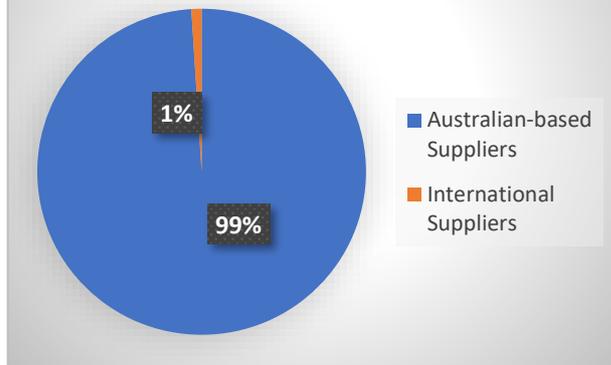
In terms of our supply chain, we have assessed the modern slavery risk of our suppliers by reference to the country or location in which they operate, and/or the level of risk generally attributed to the supplier’s industry sector, as applicable.

As our suppliers supply goods and services which support the delivery of professional services and are predominantly based in Australia, we consider there is minimal risk to Slater and Gordon being directly linked to modern slavery practices through our primary supplier contractual relationships.

Notwithstanding the foregoing, we acknowledge that there is a risk of vulnerable workers in our indirect supply chains, a situation exacerbated by the COVID-19 pandemic, the effects of which have placed unprecedented pressure on global supply chains and impacts of climate change forcing millions of people to migrate in unplanned ways putting them at higher risk of exploitation.

¹ Walk Free international human rights group provides that sectors and products at high risk of modern slavery are informal and unregulated, with poor visibility over lower tier suppliers, reliant on a workforce to carry out jobs that are considered undesirable, hazardous or low-skilled and are seasonal and low-paying. Examples of high-risk sectors include industrial cleaning, meat works, hospitality, construction, manufacturing, agriculture and fishing.

Location of our Primary Suppliers



The proportion of our FY23 suppliers who are headquartered in Australia as compared to those who are headquartered overseas is presented in the chart to the left.

Of the 3500+ vendors with whom we have direct contractual relationships only 23 are located internationally, representing one half of a percent by number and a little over one percent of our total supplier expenditure in FY23.

While none of our primary suppliers were based in countries² that have higher incidences of modern slavery, it is possible that their own supply chains could include products or

services sourced from such countries. We do not currently have any direct visibility into the supply chains of our primary suppliers though will continue to undertake analysis of those suppliers to extend our visibility, where possible, as part of our ongoing response to modern slavery risks. This includes applying our risk management processes to identify those of our suppliers that might be more vulnerable to modern slavery risk thereby indirectly exposing Slater and Gordon to modern slavery practices.

Of the Australian-based suppliers, the largest cohort consists of other professionals (ie: barristers, medical experts, cost consultants, etc.) whom we have engaged for the purposes of progressing the conduct of our clients' legal matters. Given these operate in highly regulated and transparent industries within Australia, the risk of modern slavery in these supplier operations are low.

The industry sectors relevant to our supply chain deemed by us to present a higher inherent risk of modern slavery were less than 3% of primary suppliers as show in the chart below and are summarised below.

- **Cleaning services**

The cleaning services industry represents a moderate risk of modern slavery, being an industry characterised by a high prevalence of migrant labour, the low-skill nature of the work and the propensity for work to be sub-contracted.

Presence of these risk factors necessitates a higher degree of due diligence when selecting cleaning suppliers directly – to this end we have previously declined to engage suppliers who are unable to provide assurance that they will not sub-contract the work. We have less control over (and visibility of) cleaners' working conditions in circumstances where cleaning services are engaged via building management, rather than directly.

- **IT hardware**

Slater and Gordon procures a wide range of technological hardware as a necessary means of conducting business.

It is widely known that there is a higher risk of modern slavery in the technological hardware industry, as such products are typically manufactured in countries carrying a high risk of

² North Korea, Eritrea, Mauritania, Saudi Arabia, Türkiye, Tajikistan, United Arab Emirates, Russia, Afghanistan, and Kuwait have the highest prevalence of modern slavery, with six G20 nations are among the countries with the largest number of people in modern slavery, India (11 million), China (5.8 million), Russia (1.9 million), Indonesia (1.8 million), Türkiye (1.3 million) and the United States: <https://reliefweb.int/report/world/global-slavery-index-2023>

modern slavery, including forced labour, and use products that have been mined under conditions that amount to modern slavery.

While we have no direct insight into the supply chains of the technological hardware that we procure, we are committed to working with our direct suppliers to identify the controls they have in place to mitigate the modern slavery risks in their supply chains.

- **Promotional products and stationery**

The promotional products and office stationery supply industry was identified as having higher vulnerability to modern slavery in terms of the production of those items, which tend to be low cost, and high volume, with the consequence that they tend to be manufactured in countries known to have sub-standard working conditions, including excessive hours of work and very low wage rates.

In light of the risks associated with these industries, we undertook targeted due diligence enquiries as set out in the following section.

In FY23 we calculated that suppliers engaged directly in those higher inherent risk industries represented less than 1% of our primary suppliers by expenditure. A breakdown of our primary suppliers by way of modern slavery risk categorisation is represented in the chart below.



We remain alert to those aspects of our supply chain that might be more vulnerable to modern slavery risk thereby indirectly exposing our business to modern slavery practices.

Actions to assess and address modern slavery risks

Ethical Sourcing and Modern Slavery Policy

Slater and Gordon has adopted an Ethical Sourcing and Modern Slavery Policy. The policy is designed to ensure that the company sources products and services in accordance with its legal obligations and in line with community expectations and its own values, while working with suppliers to prevent, mitigate and where appropriate, remedy modern slavery practices in their operations and supply chains.

The Ethical Sourcing and Modern Slavery Policy was reviewed during FY23.

Whistleblower Policy

Slater and Gordon also has a Whistleblower Policy, which is intended to facilitate both internal and external reporting of suspected unethical or illegal behaviour. Slater and Gordon's Whistleblower Policy expressly includes as a "reportable matter" breaches of the Modern Slavery Act and conduct which endangers the health, well-being or safety of any person.

The Whistleblower Policy was reviewed in FY23 and updated in early FY24.

Procurement Framework

Slater and Gordon has a centralised and formal procurement function, staffed by a team of dedicated procurement personnel and an established Procurement Policy and Vendor Engagement Guidelines. The procurement team worked with the business throughout FY23 to ensure that all procurement was facilitated by or with the involvement of the procurement team, in order to guide procurement in a way that ensures efficient, effective, fair and ethical sourcing of goods and services.

Our formal Procurement Policy and Vendor Engagement Guidelines, which apply to all employees engaged in the procurement of goods and services for Slater and Gordon, were reviewed and updated in FY23. The Procurement Policy and Vendor Engagement Guidelines require that supplier selection be based on defined criteria, including an evaluation of health and safety and ethical sourcing practices, as well as the completion of a modern slavery risk assessment and due diligence for all new and amended procurement activity with suppliers.

Throughout FY23, all new and renewing supplier contracts were negotiated to include a modern slavery clause appropriate to the supplier's maturity in addressing modern slavery risks in their business and supply chains. Wherever possible, we use our preferred modern slavery clause, which includes rights of audit and the ability to terminate in the event of non-compliance.

Targeted Modern Slavery Risk Response Actions

As noted above, suppliers providing us with cleaning services, IT hardware and promotional products and stationery were identified by us as presenting a higher inherent risk of modern slavery.

In considering whether it would be appropriate to continue using particular suppliers in those industries, we took the following factors into consideration:

- The supplier's publicly stated commitment to transparent and continuous improvement in the identification and mitigation of modern slavery risk in their supply chains (for example, as exhibited through their ethical sourcing program and remediation policy); and
- The supplier's responsiveness and cooperation in responding to our due diligence enquiries, including their readiness to provide details of their ethical sourcing policies and standards.

Embedding staff awareness of modern slavery risks

We continue to ensure that all new Slater and Gordon employees participate in an employee induction program in which they are required to review and be familiar with all corporate policies, including the Ethical Sourcing and Modern Slavery Policy and the Whistleblower Policy. All new employees in FY23 were required to complete an online course on the topic of Modern Slavery.

We have also incorporated modern slavery awareness training into the rolling categories of topics chosen each year for inclusion in the mandatory governance and compliance training assigned to all Slater and Gordon employees bi-annually. If any employee fails to undertake mandatory training this has consequences for the achievement of their KPIs and, where applicable, short term incentives.

Effectiveness of actions

We have continued to uplift the education and response to modern slavery throughout our business during FY23 and manage compliance with our established policies and procedures as outlined in the above section through our dedicated procurement and risk functions and through review of key performance metrics, including training completion rates, completeness of new supplier evaluations and contractual reviews, inspection of completed internal audit actions and usage of whistleblower and other internal reporting avenues.

Consultation

The Slater and Gordon Group consists of a number of wholly owned subsidiaries sitting under the head entity, Slater & Gordon Ltd. Slater & Gordon Ltd is the only entity in the group actively writing new business, employing staff and leasing office space. All other entities are in "run off" mode, operating only for so long as necessary to finalise the legal matters of legacy clients.

The overwhelming majority of Slater and Gordon's procurement activity is contracted through Slater & Gordon Ltd, with the subsidiary entities only engaging directly with professional services providers where required to progress the legal matters of legacy clients (ie: barristers, medical experts, etc).

The Executive Leadership Team of Slater & Gordon provides oversight and direction for the operations of all companies in the group. The boards of the various subsidiaries are comprised of senior executives who are also members of the Executive Leadership Team.

The Ethical Sourcing and Modern Slavery Policy binds all entities in the Group.

Looking forward

In the next reporting period, we aim to further develop our response to the risk of modern slavery in our business and supply chains through extending the maturity of our established procurement and risk management processes described within the *Actions to assess and address modern slavery risks* section above.

Approval

The Board of Slater & Gordon Ltd authorised and approved the publication of this Statement on 11 December 2023 as a joint statement for all entities in the Slater and Gordon group.

Slater & Gordon Ltd confirms that is in a position to directly influence and control each reporting entity covered by this Statement, for the purposes of satisfying the approval requirements as set out in section 14(2)(d)(ii) of the Act.

Slater and Gordon is pleased to publish this FY23 Modern Slavery Statement and commits to continuing to track and publicly report on our progress in combatting all forms of modern slavery in our supply chain.



John Somerville
Chief Executive Officer
Slater & Gordon Ltd

12 December 2023