

Modern Slavery
Statement FY25



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Introduction

This statement is jointly made by Wotton Kearney Holdings Ltd (**ABN 60 632 647 306**) and Wotton Kearney Pty Ltd (**ABN 94 632 932 131**) (together the **WK Reporting Entities**) pursuant to section 14 of the Modern Slavery Act 2018 (Cth) (**Modern Slavery Act**) on behalf of the Wotton Kearney group for the period 1 July 2024 to 30 June 2025 (FY25).

This is Wotton Kearney's fourth Modern Slavery Statement, pursuant to our obligations under the Modern Slavery Act

What is Modern Slavery?

Modern slavery refers to forms of exploitation where a person is deprived of their freedom and autonomy through threats, coercion, deception, or abuse of power. It includes slavery, forced labour, human trafficking, forced marriage, debt bondage, deceptive recruitment, worst forms of child labour, and servitude - practices that violate fundamental human rights and benefit others through control and exploitation.

Wotton Kearney rejects all forms of modern slavery and recognises that modern slavery is never acceptable in any of its forms.

Reporting Entity and Structure

This Statement is prepared and submitted as a single joint statement on behalf of the WK Reporting Entities. It covers the operations and supply chains of:

- Wotton Kearney Holdings Ltd (**ABN 60 632 647 306**), an unlisted public company limited by shares, incorporated and domiciled in Australia
- Wotton Kearney Pty Ltd (**ABN 94 632 932 131**), an incorporated legal practice registered in Australia
- Pinsani Pty Ltd (**ABN 84 099 079 802**), a private company incorporated and domiciled in Australia
- Wotton + Kearney Pte. Ltd. (**UEN 202348319W**), a private limited company, domiciled in Singapore
- Wotton Kearney Holdings Co., Ltd. and Wotton Kearney Co., Ltd. private limited companies domiciled in Thailand,

(together referred to as “the group” or “we” in this Statement). The principal activity of the group is the provision of legal services in Australia, Singapore and Thailand.

Wotton Kearney Limited (**NZBN 9429031331227**), is a separately constituted and regulated legal entity registered in New Zealand, with offices in Auckland, Christchurch, and Wellington.

The group operates under a unified governance framework, including shared policies on supplier engagement and modern slavery. By reporting jointly, the WK Reporting Entities demonstrate their shared commitment to transparency, accountability, and continuous improvement in addressing modern slavery risks.

Operations and Supply Chain

Who we are

Founded in 2002 with two partners, four lawyers and boundless ambition, the Wotton Kearney group now has a dynamic force of over 700 professionals, including 80+ partners, spanning 9 offices across Australia, Singapore and Thailand.

Wotton Kearney is the 'go-to' law firm in the Asia Pacific region for the majority of local, global and London market insurers, as well as brokers and corporates, particularly with the more complex issues facing the market. We are highly regarded in the areas of complex property, energy and infrastructure claims, general liability (including product liability, property damage and public liability), and financial lines (including D&O, regulatory investigations and professional liability claims).

Wotton Kearney also has specialist teams in the areas of cyber, privacy and technology, government, healthcare, marine and transport, media and defamation, workplace and safety, as well as a dedicated commercial litigation and class actions offering. For more information about our services, please click [here](#).

Our supply chain

Wotton Kearney procures goods and services for the purpose of providing legal services across the following main categories:

- Professional services such as accounting and legal services
- Occupancy of premises
- Administrative and support services, such as cleaning, recruitment and travel services
- IT goods and services
- Financial and insurance services
- Construction and fit out
- Education and training
- Retail and wholesale trade services, such as furniture, stationery and office supplies
- Hotel and restaurant services
- Legal creditors such as barristers and experts

In FY25, our supply chain involved 4,012 suppliers of goods and services. Suppliers paid through staff corporate credit cards are not counted in this number.

91% of our supplier spend was within Australia.

Modern slavery risks in WK's operations

Modern slavery is a low risk within our operations. As a law firm, we primarily provide legal services to commercial clients, and most of our workforce consists of legal and business professionals based in Australia, Singapore and Thailand.

Within our operations, our workforce and recruitment of staff potentially expose us to modern slavery risk. We mitigate this risk by:

- determining a reasonable and responsible salary in each jurisdiction we operate in, including by benchmarking against comparable employers in the host country
- ensuring that we recruit staff in line with all applicable employment laws and requirements,
- using our in-house recruitment managers to handle most hiring directly, which lessens our dependence on outside recruitment agencies.

Despite using in-house recruitment managers for the majority of recruitment, WK's continued growth trajectory meant that 6% of total supplier spend was directed to recruitment, reflecting targeted growth in our Australian and Singapore operations. We recognise that relying on external agencies increases the risk of modern slavery in our operations because we have less oversight of external agency recruitment methods. Heightened due diligence into outside recruitment agencies will be a focus for us to continue to improve our response to modern slavery.

Modern slavery risks in WK's supply chains

We adopt a risk-based methodology to identify and address modern slavery risks across our supply chains. Leveraging insights from two data-driven platforms, we evaluate inherent risk, control measures, residual risk, and risk events across our supply chain.

The assessment for FY25 considered 504 suppliers with the highest spend amounts. Legal creditors such as barristers and experts were excluded. While credit card spend is typically excluded from

the assessment, we incorporated credit card spend from our Singapore operations above an agreed threshold, recognising the higher exposure to modern slavery risk in that region. For the most part, spend data from our Thailand operations was not included in our FY25 risk assessment because the Bangkok office did not open until 28 May 2025.



516

Total number of suppliers assessed for modern slavery risk

504

Suppliers that underwent external supply chain mapping and assessment

39

Suppliers that underwent additional screening for modern slavery

0

Suppliers assessed as High Risk

5

Suppliers assessed as Moderate Risk

112

Suppliers assessed as Moderate Low Risk

399

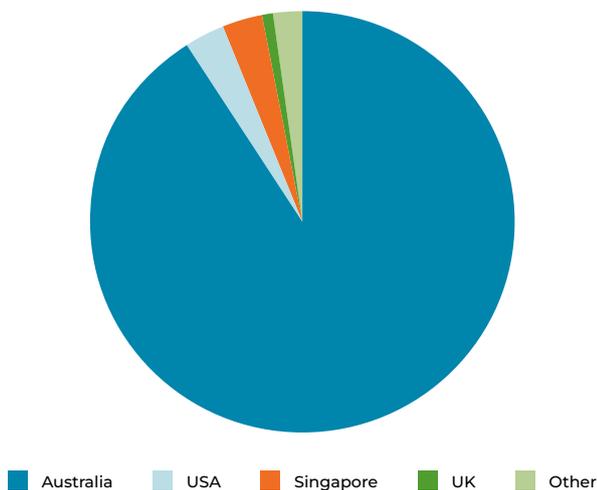
Suppliers assessed as Low Risk

We have assessed the overall risks of modern slavery occurring in our supply chains as being relatively low.



The pie chart below shows our total spend for our FY25 financial year by supplier location. 91% of our spend was within Australia. Our overseas expenditure spanned suppliers based in 9 countries, including the USA (3%), Singapore (3%), the United Kingdom (1%), the Netherlands, China, Germany, Israel, Thailand and Türkiye. This overseas spend was largely confined to IT, cyber security, recruitment services, and business development services.

Top country spends



While we have not identified any instances of causing modern slavery in our operations or supply chains, Wotton Kearney recognises that modern slavery risk exists across all sectors and organisations which may mean we are directly or indirectly exposed to the risk of modern slavery.

We continue to identify the following areas within our supply chain with an elevated risk of modern slavery:

- Occupancy of premises
- IT goods and services
- Recruitment
- Hotel and restaurant services
- Construction and fit out

We have set out below some context for that elevated risk. In response, we have focussed our modern slavery actions for the next financial year to focus on suppliers that fall within these industries.

Real Estate services & non-residential Property Operators

We continue to identify real estate services, such as office leasing, and facilities management, as a Moderate-Low risk for modern slavery. We recognise that the cleaning, waste management, and security sectors are vulnerable due to issues like wage underpayment, subcontracting, long hours, and safety concerns, with migrant workers at greater risk of exploitation. As we expand our geographical footprint in South-East Asia, where there is a higher prevalence of modern slavery than in Australia, we recognise an increased risk of modern slavery in this industry area.

IT Goods & Services

The electronics sector is widely recognised as higher-risk for modern slavery due to its long and complex global supply chains. As an end-user of electronic goods such as ICT and office equipment, building systems, and appliances, we understand that this risk can be at various levels of the supply chain. This is particularly pronounced in material extraction, manufacture and hardware disposal stages, which often relies on low skilled, low paid and vulnerable labour.

All of our ICT contracts are subject to pre-contract modern slavery risk assessment and incorporate our Modern Slavery Supplier Code of Conduct or comparable modern slavery obligations. We have also moved to a leasing model for IT equipment where the leasing provider retains ownership, manages refurbishment and end-of-life disposal. This provides more transparency and a single supplier-partner responsible across the lifecycle of the IT equipment.

Hotel and restaurant services

We continue to identify hotel and restaurant services as an industry with an elevated risk in our supply chains. Catering services, hotels and restaurants are particularly vulnerable to exploitation due to the industry's labour-intensive nature and connection with agricultural supply chains.

While our catering providers are locally sourced and have not been identified as carrying out activities linked to modern slavery, we recognise they rely upon wholesale sourcing of food products that have commonly been linked with exploitation of migrant workers on farms. In FY25 we focused on identifying a range of sustainable and ethical caterers for use across our Australian offices. We have started to use them for internal staff events and will track usage in subsequent years.

As part of our broader responsible business overview, we undertook additional supplier due diligence into modern slavery risk of hotel providers to help inform the development of our responsible procurement framework.

Construction services

Wotton Kearney continued to have an elevated spend on construction costs in FY25, associated with the relocation and fit out of our Brisbane office and initial stages of relocating our Canberra office. The high demand for a base-skill workforce, use of labour-hire agents, and reliance on migrant workers make construction an elevated risk for modern slavery. Additionally, widespread subcontracting within the industry complicates oversight of working conditions and compliance with labour standards. To mitigate these risks, we undertook modern slavery risk assessments of the construction companies engaged for the fit out of each office.

Actions taken to assess and address modern slavery risks

In FY25, we strengthened our approach to assessing and mitigating modern slavery risks across our operations and supply chains. Building on prior years' commitments, we implemented targeted actions designed to enhance due diligence, broaden our human rights lens, and deepen engagement with stakeholders.

Area of focus	Actions taken in FY25
Understanding the risk	<ul style="list-style-type: none">• Annual modern slavery risk assessment of our operations and supply chain• Supplier risk assessments (supplier onboarding)• Integration of the NSW GRS Inherent Risk Identification Tool into our modern slavery risk assessments and supplier onboarding processes. This tool enables us to identify inherent modern slavery risk attributed to particular product/service categories in our supply chain and provides an additional data-driven approach to risk assessment.• Conducted research into modern slavery risk in Singapore and Thailand, acknowledging the elevated prevalence of modern slavery in these jurisdictions compared to Australia. This research will inform our supply chain mapping and engagement strategies as we expand operations in South-East Asia.
Due diligence	<ul style="list-style-type: none">• Our risk assessment now integrates broader labour and human rights due diligence, drawing on insights from Purpose Bureau's ESG Bureau. It highlights salient risks across our supply chain, informed by the assessment of the suppliers' inherent risks, controls and key risk events including sanctions, financial exclusion, human rights, employee compensation and work health and safety• Additional supplier due diligence into modern slavery risk of hotel providers and merchandise suppliers to help inform the development of our responsible procurement framework.
Training	<ul style="list-style-type: none">• Education and awareness for all staff to strengthen understanding of modern slavery risks. Each December, we issue an all-staff email highlighting the importance of identifying and addressing modern slavery risks. Modern slavery awareness is embedded in our Community Footprint induction for all new starters, ensuring early engagement with our commitments. In addition, we host an annual webinar in February for all employees, focusing on our modern slavery response and key areas of risk. To support ongoing learning, we maintain a dedicated modern slavery intranet site that provides resources, guidance, and updates throughout the year.
Industry collaboration	<ul style="list-style-type: none">• Participated in industry group meetings and forums to share insights and best-practice. These engagements support continuous improvement across the legal sector.

Area of focus	Actions taken in FY25
Commitment to economic empowerment	<ul style="list-style-type: none"> Hosted two cadets from the Arise Foundation under our WKadetship program, providing employment experience and pathways for women who have experienced financial abuse and/or modern slavery. This initiative reflects our commitment to supporting long-term economic empowerment and independence of survivors.

Pro bono legal support	<ul style="list-style-type: none"> Expanded pro bono focus areas to include migrant worker exploitation, recognising the heightened vulnerability of temporary and migrant visa holders to underpayment and coercive practices.
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Case study: Migrant exploitation and visas

In the last year, we saw an increase in referrals from our pro bono partners to provide advice and representation to migrant workers experiencing underpayment and other exploitation in the workplace.

Through our assistance in these cases, we saw how unscrupulous employers count on migrant workers not pursuing their claims out of fear their visa will be cancelled. Recognising that barrier, in the last year we established a pro bono partnership with community legal centre, Redfern Legal Centre, to help consider eligibility of migrant workers for a Workplace Justice Visa, a temporary visa that allows the holder to stay in Australia to take legal action if they have experienced workplace exploitation.

Through our general pro bono employment work, we also saw the challenges that workers who have succeeded in their claims have in enforcing their judgments against their former employers and the limited avenues of assistance available to support them to take such action. As a result, we have developed a practice providing pro bono assistance in this area.



Assessing the effectiveness of our ongoing modern slavery response

We continue to monitor and track our progress through a measure of reviews, oversight, and tracking KPIs.

Understanding the impact and risk of causing, contributing to or being directly linked to modern slavery	
Number of modern slavery questionnaires completed	32 We are reviewing our supplier self-assessment questionnaire to make it more accessible for suppliers to complete, while still maintaining a robust risk assessment process.
Number of new and existing suppliers screened for modern slavery risk	39
Number of suppliers who have incorporated modern slavery provisions in contracts and/or our Modern Slavery Supplier Code of Conduct	30
Reviewing our policies and procedures	
Annual review of our Modern Slavery Policy	Policy reviewed. No substantive changes in FY25.
Building staff awareness and capacity	
Increase in the number of staff trained in identifying and addressing modern slavery	We saw an increase in the number of staff attending our annual modern slavery awareness training from 162 in FY24 to 202 in FY25.
Remediation and grievance mechanisms	
Number of recorded modern slavery incidents, the type of human rights issue raised and the outcome	0
Annual review of Modern Slavery Grievance Policy and Procedure	Reviewed (see case study below). No substantive changes to policy or procedure in FY25

Case study: Our Modern Slavery Grievance Process

Wotton Kearney is committed to maintaining a transparent and robust mechanism for addressing concerns related to modern slavery within our operations and supply chain. Our Modern Slavery Grievance Process is designed to be accessible, confidential, and responsive, ensuring that any individual, whether an employee, supplier, or third party, can raise concerns in the knowledge that those concerns will be taken seriously.

Grievances may be lodged through multiple channels, including via email, an anonymous online reporting form available on our website, or by requesting a face-to-face meeting with our Chief People Officer. Individuals can choose the method most appropriate to their circumstances.

All grievances are handled promptly and impartially by Wotton Kearney's Responsible Business team in collaboration with the Chief People Officer and General Counsel. Where Wotton Kearney's own operations are the subject of a grievance, we will engage an independent auditor to investigate the grievance. Investigations focus on establishing facts and identifying appropriate remedial actions. Confidentiality is maintained at all stages to protect the integrity of the investigation and the safety of those involved.

To encourage reporting and continuous improvement, Wotton Kearney reviews the effectiveness of its grievance mechanism on an ongoing basis. Over the last four years of reporting, we have built on our foundational grievance process by:

- introducing an anonymous online reporting form
- simplifying the grievance process to make it more accessible
- incorporating learnings from Fair Supply and Human Rights Law Centre reviews to improve our approach to remediation and remedy
- redrafting the grievance policy to adopt simpler language to improve readability and accessibility.



Consultation and statement approval

This statement was prepared by the Wotton Kearney group's Responsible Business team in consultation with cross-functional management employees with expertise in corporate governance, risk management, supplier management and procurement. Drafts of the statement were presented to the Executive Leadership Team and shared with members of each controlled entity for review and feedback.

In accordance with section 14 of the Modern Slavery Act:

- the Board of Wotton Kearney Holdings Ltd approved this statement on 4 December 2025.
- the Board of Wotton Kearney Pty Ltd approved this statement on 4 December 2025.

This statement is signed by David Kearney, Chief Executive Partner and Director of both Wotton Kearney Holdings Ltd and Wotton Kearney Pty Ltd.

Signed:



David Kearney
Chief Executive Partner
Wotton Kearney



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