



# Modern Slavery Statement

1 July 2019 — 30 June 2020



Maddocks

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# A note from the CEO and the Chairman of the Board

At Maddocks, our goal is to make a difference for our clients, each other and the community. Our commitment to human rights is a fundamental part of achieving this goal.

Whether it's the work we do for our clients, the way we engage with suppliers, our pro bono program, or supporting human right initiatives through our charitable program, Maddocks is committed to upholding and promoting human rights, and acting ethically in everything we do.

Modern slavery is a global and complex human rights challenge faced by governments and businesses alike, and encompasses exploitive practices such as debt bondage, servitude, child labour, forced labour and human trafficking. With more than 40 million people around the world estimated to be victims of modern slavery, the issue demands our attention.

Maddocks welcomes the introduction of the Modern Slavery Act 2018 (Cth), and the transparency it requires from reporting entities, as a significant milestone in Australia's response to modern slavery.

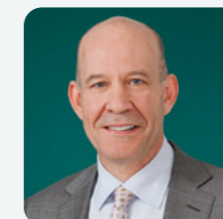
This Statement sets out the clear steps that Maddocks has taken during our first reporting year (the financial year ending 30 June 2020) to identify, assess and address modern slavery risks within our operations and supply chain.

We are pleased to report that we have not identified any specific instances of modern slavery. More importantly, we are committed to building on this foundation work in the years ahead, further developing our systems and controls within our business to effectively prevent and manage the risks of modern slavery.

This significant body of work in our first reporting year makes clear our intention as a firm to build on our response in the years to come.



**David Newman**  
Partner & CEO



**Mark Henry**  
Partner & Chairman  
of the Board

# Criterion 1

## Identify the reporting entity

Section 16(1)(a) of the Modern Slavery Act requires modern slavery statements to identify the reporting entity or entities covered by the statement. This section confirms that Maddocks is the only reporting entity covered by this Statement.

This modern slavery statement (**Statement**) is made by Maddocks ABN 63 478 951 337, Collins Square, Tower Two, Level 25, 727 Collins Street, Melbourne VIC 3008 (referred to as **we, us, Maddocks, the Firm** in this Statement).

Maddocks is a single reporting entity under the Commonwealth *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) and this Statement is submitted and published for the financial year ending 30 June 2020, in accordance with section 13 of the Modern Slavery Act.

This Statement addresses each of the seven mandatory criteria for reporting set out in section 16 of the Modern Slavery Act.

# Criterion 2

## Describe the reporting entity's structure, operations and supply chains

Section 16(1)(b) of the Modern Slavery Act requires modern slavery statements to describe the structure, operations and supply chains of the reporting entity. This section outlines our structure, operations and supply chains, including the nature of our supply chain at a high level.

### Our structure

Maddocks is a proudly independent Australian law firm, operating as a partnership. Maddocks currently has 81 partners, and over 500 employees, nationally.

Maddocks wholly-owns Maloch Pty Ltd ACN 005 387 100, which is a service entity providing administrative and other support services to Maddocks.

### Our operations

Maddocks has been providing legal services in Australia since 1885 from our Melbourne office, while we began expanding our operations with the opening of our Sydney and Canberra offices in 2002 and 2012 respectively. Maddocks delivers a broad range of commercial legal services to public and private entities, not-for-profits and individuals throughout Australia and internationally.




Maddocks provides legal advice across a range of sectors, and 43 practice areas. Our key areas of expertise include:

- Construction and Projects
- Corporate and Commercial, Dispute Resolution and Litigation
- Employment & Workplace
- Government Advisory
- Property & Development.

In addition to the Firm's core legal services, Maddocks operates ML&C Collections, our debt recovery agency. We have also established a charitable program, which supports community projects and programs by providing annual grants to charitable organisations across Australia.

### Our supply chains

Maddocks procures goods and services in the following key categories:

-  Information Technology
-  Premises and Facilities
-  Marketing and Business Development
-  Professional Services
-  Knowledge, Learning and Development
-  Recruitment

The majority of goods and services that we procure come from suppliers based in Australia. Key suppliers are engaged on a long term contractual basis, while arrangements with smaller suppliers are sometimes short term and ad hoc.

# Criterion 3

## Risks of modern slavery practices in our operations and supply chains

Section 16(1)(c) of the Modern Slavery Act requires modern slavery statements to describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls. This section describes the key risk areas for modern slavery for Maddocks, which mainly relate to our supply chain.

In this section we identify the 'risks of modern slavery practices', meaning the potential for Maddocks to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.

The Modern Slavery Act defines 'modern slavery' as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services.

In this reporting period, Maddocks has completed a detailed scoping exercise to identify key areas of modern slavery risk in our operations and supply chain. It was critical to take the time to do this properly, as the information obtained from this scoping exercise will form the foundation for planning our ongoing anti-modern slavery program.

This scoping exercise involved conducting comprehensive surveys of key stakeholders in each area of our business, including those involved in the procurement of goods and services. The responses to the surveys enabled us to construct a broad map of our operations and supply chains, and to identify areas presenting increased modern slavery risks.

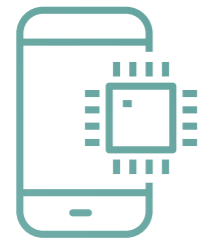
To evaluate modern slavery risk areas we looked at specific known risk factors outlined in the 'Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities' published by the Commonwealth Government (Commonwealth Guidance). This approach is consistent with the UN Guiding Principles on Business and Human Rights.

As the key operational functions of Maddocks involve the employment or engagement of staff in our offices in Melbourne, Sydney and Canberra to deliver legal services or support the delivery of our legal services, Maddocks has assessed the risk of modern slavery in its operations as relatively low.

This risk assessment was made on the basis that the legal framework and our own policies and procedures which regulate conditions of employment of our staff (further described on [page 14, Criterion 4](#)), provide a high watermark to protect against modern slavery occurring within our operations.

At this stage, the main area of operations we have identified as presenting a higher risk of modern slavery is our charitable program, which supports community projects and programs by providing annual grants to charitable organisations across Australia. We have taken steps as outlined in [Criterion 4](#), to improve our oversight over this.

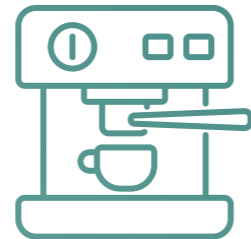
## We have identified the following key risks in our supply chain:



### Sector and industry risks:

Electronics and textiles are recognised as high risk industries globally.

- Maddocks procures IT equipment including phone headsets, mobile phones, laptops, monitors and accessories.
- Maddocks sources sports uniforms.



### Product and services risks:

Paper and coffee beans are recognised as a high-risk product globally. Similarly, services such as cleaning are recognised as high-risk services.

- Maddocks procures stationery, including for marketing purposes.
- Maddocks uses the cleaning services provided by the building management at each of our office sites.
- Maddocks procures coffee beans for its in-house café.



### Geographic risks:

Some countries may have higher risks of modern slavery. The *Global Slavery Index 2018* of the Minderoo Foundation ranks countries based on the government response to modern slavery. Maddocks procures goods and services from the following countries, which may present a higher risk of modern slavery:

- **South Africa:** our outsource provider, providing word processing, debt recovery, property development law clerk support and s173 agreement support.
- **China:** We source umbrellas, sports uniforms, and branded items such as pens and water bottles, which may be made in China.
- **The Philippines:** Our IT infrastructure hosting, security and support supplier is located in the Philippines.



### Entity risks:

Some entities may have higher risks of modern slavery because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.

- We have not identified any entity-specific risks.

# Criterion 4

## Actions we have taken

Section 16(1)(d) of the Modern Slavery Act requires reporting entities to describe the actions they have taken to assess and address the risks outlined in the previous section, including due diligence and remediation processes. This section addresses this criterion by detailing the steps taken by us during the reporting period to assess and address modern slavery risks as well as our agreed roadmap.

### Actions taken in the reporting period

Maddocks recognises that developing and effecting an anti-modern slavery program is an ongoing journey of continuous improvement.

In our first reporting period, we have focused on:

- conducting due diligence to identify Maddocks key modern slavery risks (see [Criterion 3](#))
- assessing the policies, systems and controls we already have in place to prevent and mitigate those risks
- conducting a gap analysis to identify what further policies, systems and controls we need to implement to build a robust anti-modern slavery program
- establishing roles and responsibilities within the Firm for our modern slavery compliance
- training and education of key staff.

Set out in this section is an overview of the steps we have taken during this reporting period to assess and address the risks in our operations and supply chains, and the existing policies and processes we have in place that can be used to facilitate further risk assessment, prevention and mitigation.

### Actions taken relating to our operations

#### Management systems and controls

We have established a dedicated, cross-functional Anti-Modern Slavery Project team, to oversee the Firm's modern slavery response. The team includes our Chief Operating Officer, Chief Information Officer, Head of Knowledge, Facilities Manager, Director of People and Culture, and Director of Business Development, Communications & Marketing.

#### Internal assessment

We designed and conducted comprehensive internal modern slavery surveys for key stakeholders, to gather the information necessary to map our operations, identify key risks, and understand existing controls.

#### Policies

Maddocks' operations are governed by a formal Code of Ethical Conduct. This Code is founded on one of the Firm's core values – Integrity. The Code sets out guidelines to ensure Maddocks conducts its business with the highest standard of integrity and in accordance with all applicable laws and regulations. The Code also includes processes for reporting unethical or illegal conduct.



## Employment practices

We have robust policies and procedures in place for recruitment and remuneration of staff, ensuring compliance with all applicable employment laws and regulations. Staff in support roles, shared services, as well as graduates are covered by the *Legal Services Award*, which is reviewed annually by our People and Culture team to ensure we comply. Lawyers have their salaries benchmarked against the industry.

## Maddocks charitable program

We have begun a review of our charitable program processes to determine how best to incorporate modern slavery due diligence for charity applicants. As outlined in [Criterion 3](#), this is an area we have identified as potentially having a higher risk of modern slavery in our operations.

## Actions taken relating to our supply chains

### Internal assessment

We designed and conducted internal surveys of key stakeholders to gather the information necessary to map our supply chains, identify key risks, and understand existing controls.

### Policies

Ethical procurement is a well-established principle in our procurement processes. Maddocks has an existing Procurement Policy, Code of Ethical Conduct and Environmental Policy. These require all procurement to be ethical and to comply with applicable laws, and include processes for reporting unethical or illegal conduct.

### Supplier vetting and monitoring

Maddocks has identified a number of existing processes used to assess and monitor suppliers, which can be leveraged to assess and address modern slavery risk. For example:

- Reference checking for potential suppliers
- Completion of a 'request for information' questionnaire for potential suppliers. We have incorporated specific modern slavery due diligence questions into our screening process for potential suppliers in IT and key procurement tenders during this reporting period;
- To monitor existing suppliers, Maddocks conducts site visits from time to time, including to overseas sites. For instance, during the past three years, Maddocks has conducted site visits to suppliers in Malaysia, the Philippines and South Africa.

## External supplier assessment

We designed a comprehensive modern slavery survey for our external suppliers. The aim of the survey is to better understand potential modern slavery risks within our supply chains, and the responses will be used to inform our anti-modern slavery program going forward. The survey covers topics including Management of Supply Chains, Whistleblowing, Forced and Bonded Labour, Child Labour, and Investigations and Enforcement Issues. We intend to use a targeted, risk based approach, and in the next reporting period will survey the suppliers which we have identified as presenting a higher risk of modern slavery, due to product and service risk, sector and industry risk, or geographical risk (outlined in [Criterion 3](#)).

### Training and education of staff:

During the reporting period, we have:

- developed general training regarding the new Modern Slavery Act which has been attended by a number of general staff across the firm as well as some key staff with responsibilities on our Anti-Modern Slavery Project team. This training session is available through our Learning and Development Portal
- provided specific education to our Risk Management Committee in the lead-up to the approval of the Statement by the Board
- appointed 'modern slavery compliance champions' within the firm – these include Partners and legal staff who have been responsible over the last 2 years to be across developments in the modern slavery space and support the activities of our Anti-Modern Slavery Project team and generally help to assist with our Modern Slavery Act compliance
- published a significant amount of articles and materials regarding the Modern Slavery Act which have been read by a number of our staff across all offices.

We have also designed a more tailored modern slavery training program for key Maddocks staff, including those involved in procurement. Due to the COVID-19 pandemic, we were unable to conduct this tailored training program face-to-face, and will complete the tailored training program via an online medium in the next reporting period.

## What is next?

Maddocks is committed to continuing improvement in our stance against modern slavery. We are looking forward to building on the foundation work described above. Our key priorities for the next reporting period are:

**Implementing a new Anti-Modern Slavery and Human Trafficking Policy** to complement and enhance the Firm's existing policies and procedures.

**Training more staff and more targeted training:** We will continue to roll-out online Anti-Modern Slavery training to our key project team, and design training for wider staff to educate our people on modern slavery risks, and to support them in identifying, preventing and mitigating modern slavery risks in Maddocks' business and supply chains. This will complement and build on the training and education we have already conducted.

**Continuing to conduct due diligence on our suppliers:** Using a targeted, risk-based approach, we will conduct surveys of those suppliers identified as presenting a higher risk of modern slavery, to better understand potential modern slavery risks within our supply chains.

**Implement specific modern slavery clauses** in supplier contracts, in a prioritised risk-based way. We are aware the Australian Government developed a suite of modern slavery contract clauses for inclusion in Government contracts for the procurement of goods and services. These clauses were released after our reporting period. While these clauses are aimed at Government procurement, we believe they provide a helpful baseline for the private sector as well. We intend to review these clauses as we develop and implement our own modern slavery clauses in a prioritised risk-based way.

# Criterion 5

## The effectiveness of our actions

Section 16(1)(e) of the Modern Slavery Act requires modern slavery statements to describe how the reporting entity assesses the effectiveness of the actions being taken to assess and address modern slavery risks. This section addresses this criterion by outlining the steps taken by us during the reporting period to review the effectiveness of our actions to assess and address modern slavery risks. This section also sets out how Maddocks will track the effectiveness of our actions in future statements.

In this first reporting period, our focus has been on identifying and assessing the risks of modern slavery in our operations and supply chain, to establish a foundation for our anti-modern slavery program. As our program develops, in future reporting periods we will be in a position to introduce appropriate measures of its effectiveness.

Area	What we did	What was the outcome
Training, education and awareness activities	Developed and delivered general training to a number of staff as well as key staff with roles and responsibilities in procurement or on our Anti-Modern Slavery Project team as well as making general modern slavery publications available	Changes in understanding of modern slavery risks in our staff
	Specific modern slavery education of the Board and our Risk team	Engaging senior management, executives and board members has helped to ensure they understand not only the statement process but the wider objectives of the Modern Slavery Act
	Identified further training priorities as part of our compliance program	Training materials and resources remain 'fit for purpose' and build on general training with more bespoke and targeted education
Procurement and supplier engagement	Map and identify key suppliers and risks at a high level via our internal assessment process	Maddocks now has a more nuanced understanding of our supply chains, modern slavery risks and how to address these risks
	Identify gaps in our policies and procedures	Maddocks now understands where we need to supplement our existing policies and procedures to better manage modern slavery risks
	Identified the need for further assessment of higher risk suppliers.	Maddocks now has a clear picture of which suppliers it will be targeting for further review based on risk and where to prioritise our supplier engagement

In order to assess the effectiveness of our actions in addressing modern slavery going forward, we intend to develop appropriate key performance indicators. We expect these will include:

- The number of staff who complete the modern slavery training program
- The number of suppliers who respond to our external supplier surveys
- The number of supplier contracts incorporating ethical sourcing clauses.

# Criterion 6

## Our consultation process

Section 16(1)(f) of the Modern Slavery Act requires reporting entities to describe the process of consultation with any entities that the reporting entity owns or controls. To address this criterion, this section outlines how Maddocks prepared this Statement including consultations with Maloch Pty Ltd.

Maddocks wholly owns Maloch Pty Ltd, which operates as Maddocks' service company. As Maloch Pty Ltd is integrally connected to Maddocks' business, the operations and supply chains of Maloch Pty Ltd have been included in our modern slavery response plan.

Accordingly, any references in this Statement to Maddocks' operations and supply chain include the operations and supply chain of Maloch Pty Ltd.

For the avoidance of doubt, this Statement is a single modern slavery statement by Maddocks, and not a joint statement. Maloch Pty Ltd is not a reporting entity for the purposes of the Modern Slavery Act.

Given Maloch Pty Ltd is integrally connected to Maddocks, including sharing the same key staff across procurement and shared governance and risk assessment structure, it was not necessary to have a formal consultation process.

# Criterion 7

## Provide any other relevant information

Section 16(1)(g) of the Modern Slavery Act allows for reporting entities to include any other relevant information that the reporting entity thinks is relevant. Based on Government guidance we think it is relevant to outline the impacts of Covid-19 as well as how Maddocks has been contributing to the discussion of modern slavery more broadly.

### The Impacts of COVID-19

While we have already taken meaningful steps in our modern slavery response, like most organisations, we have needed to dedicate unexpected time and resources to deal with the immediate consequences of COVID-19 on our business. This has impacted our modern slavery response during our first reporting period by:

- reducing the amount of time and resources available to progress our anti-modern slavery project, and consequently delaying some planned compliance measures to the next reporting period
- reducing our ability to conduct site visits at supplier premises (including in the Philippines)
- reducing our ability to conduct face-to-face training, resulting in a deferral of some aspects of our more targeted training program.

More broadly, Maddocks understands that the COVID-19 pandemic has increased the risk of modern slavery around the world, not only by disrupting anti-slavery efforts but also by increasing the vulnerability of workers and creating new risks of slavery. The impacts of COVID-19 will be considered as part of our ongoing supplier due diligence program.

### Maddocks thought leadership

Maddocks has taken a keen interest in the prevention of modern slavery, not just in terms of the Firm's own compliance, but more broadly, in terms of how we can assist others in their stance against slavery. We care about human rights and seek to make a practical contribution to raise collective awareness about this important issue. We are committed to educating our clients in this area. Some of our significant contributions so far include:

- Ensuring modern slavery training featured on our Flagship Client CLE Program in March 2020. The response and feedback from the presentation was extremely positive with our clients showing a keen interest in the area. One client remarked: *'Thank you for the Modern Slavery Presentation at the CLE session – it was one of the best I have seen.'*
- We published the [Guide to Modern Slavery Laws for the Communications Industry](#). The efforts and the impact of this Guide for the Communications Industry were recognised as part of the ACOMM Awards 2020, where Maddocks was short-listed as a finalist in the [Professional Services Category](#). The Guide is available on our [website](#).
- We have published a [significant number of articles, blog posts and publications](#) about complying with the Modern Slavery Act. This content has been popular with our clients and is available freely on our [website](#).

# Approval and signing

Section 13(2) of the Modern Slavery Act requires statements for single reporting entities to be approved by the principal governing body of the entity and signed by a responsible member of the entity. The Commonwealth Guidance states: "It is best practice that the head of the principal governing body signs the statement (for those entities where the responsible member is a member of the principal governing body). For example, if the reporting entity has a board, then the chair of the board or the Chief Executive (if they are a member of the board) should sign your statement." Accordingly, this section outlines how our Statement has been approved by our Board and signed by our Chairman of the Board.

In accordance with Section 13(2) of the Modern Slavery Act, this Statement was approved by the Board of Maddocks (ABN 63 478 951 337) on Thursday 10 February 2021.

The Board is the principal governing body of Maddocks, for the purposes of approving this Statement.

This Board has authorised Mark Henry, Partner and Chairman of the Board to sign this Statement.



Signature

**Mark Henry**  
Partner and Chairman of the Board  
Maddocks, an Australian partnership

Thursday 10 February 2021

Date

Maddocks is an independent Australian law firm that provides legal services to corporations, businesses and governments throughout Australia.



We advise clients across consumer markets, construction, technology, telecommunications, healthcare, education and professional services from our Canberra, Melbourne and Sydney offices. We aim to work to make a difference for our clients, each other and the community.

We're committed to our clients. In fact, our brand and market reputation reflect this focus. Our service is based on a deep understanding of our clients' legal requirements in the context of their business objectives. We're highly regarded for exceptional, practical legal services that genuinely add value.

We work collaboratively with our clients to build strong, sustainable relationships – our longest is now more than 100 years old. Our lawyers aim to deliver consistently high standards of service, and we understand the importance of accessibility, responsiveness and transparency. Working with us, you'll enjoy open communication, meaning well scoped, appropriately resourced and effectively managed matters.



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