



30 Days Series 18 by Zhang Kaihui

MODERN SLAVERY STATEMENT FY24

1 July 2023 - 30 June 2024

KING&WOOD
MALLESONS
金杜律师事务所

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ACKNOWLEDGEMENT OF COUNTRY

We acknowledge the Traditional Owners of the lands on which we work and live and pay our respects to Elders past and present. We recognise that this land always was and always will be Aboriginal and Torres Strait Island land.

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REPORTING ENTITIES AND STRUCTURE

INTRODUCTION

KWM Australia is committed to identifying, assessing, and addressing modern slavery risks in our supply chain and business operations.

This is our fifth modern slavery statement and is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) (**Modern Slavery Act**) for the period 1 July 2023 to 30 June 2024 (**FY24 or Reporting Period**).

REPORTING ENTITIES AND STRUCTURE

This statement is made on behalf of KWM Australia, comprising:

- **King & Wood Mallesons, a partnership in Australia:** which provides legal services to our clients; and
- **Dabserv Pty Ltd¹:** which provides various support services (such as premises, finance, technology, procurement, travel, people & development and business development services) to the Australian partnership.

Each entity has its own employees and suppliers.

For convenience, a reference in this statement to KWM Australia refers collectively to both entities unless otherwise specified.

KWM Australia is part of King & Wood Mallesons, a global law firm headquartered in Asia, with offices in 26 locations around the world.

Globally, King & Wood Mallesons operates under a Swiss Verein structure (a legal entity formed under Swiss law) and is comprised of member firms across different regions, including independent partnerships in Australia, the People's Republic of China (**China Partnership**) and the Hong Kong Special Administrative Region of the People's Republic of China (**Hong Kong Partnership**).

Legal services are provided independently by each of the separate King & Wood Mallesons member firms. KWM Australia does not own or control the foreign business operations of these independent member firms of King & Wood Mallesons. See our website at [kwm.com](https://www.kwm.com) for more information on the King & Wood Mallesons global structure including KWM Australia's status within that global structure.

¹ Dabserv Pty Ltd (ACN 008 551 993), with its registered office located at Level 61 Governor Phillip Tower, 1 Farrer Place, Sydney, is trustee of the firm's service trust.

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OPERATIONS AND SUPPLY CHAIN

OUR OPERATIONS

KWM Australia is a full-service commercial law firm delivering a range of transactional and disputes-based legal services and capability. We have market leading legal expertise across a wide range of legal practice areas, including cross-border mergers and acquisitions; private equity; public M&A; employment; intellectual property; competition; international funds; commercial litigation; international arbitration; projects, energy and resources; real estate; construction; environment; tax; banking and finance; and restructuring and insolvency.

Our core business function involves the delivery of specialist professional legal services to our clients.

We advise and support our clients, both domestically and internationally on complex Australian law matters across a range of sectors.

In FY24, we launched Owl Advisory, a multi-disciplinary service which helps clients establish compliance and governance systems, implement regulatory changes, navigate requirements of sustainability reporting, as well as general governance risk and issue management. KWM partners and lawyers who assist Owl Advisory do so as part of their role as KWM partners and lawyers. We also employ several risk compliance advisors who work for Owl Advisory.

In addition to the provision of professional legal services, in Australia we offer clients resourcing support through a short-term contract engagement service known as KWMConnexion.

OUR WORKFORCE

KWM Australia employs approximately 1700 people in Australia (not including partners) and operates from 5 centres located in Brisbane, Canberra, Melbourne, Perth and Sydney.

In addition to our lawyers, we have a number of shared services and support functions that deliver critical business services, including Technology, Finance, Business Services, Business Development, Knowledge, and People & Development.

Our workforce includes approximately 100 staff from outside Australia on working visas. We use labour hire agencies in Australia in limited circumstances to support casual personnel requirements within our legal, hospitality and other shared services teams.

WHERE WE OPERATE

While KWM Australia's operations are predominantly based in Australia, as a member of the King & Wood Mallesons global network, KWM Australia has relationships with other members of that network which have operations outside Australia, as part of a common global vision. The members of the network trade under a common name to provide seamless multi-jurisdictional legal services to the world's leading commercial entities.

As part of the global arrangements, some management, procurement and other support services are provided by foreign Verein subsidiaries to member firms including KWM Australia.

KWM Australia has an affiliate entity, King & Wood Mallesons LLP (a Singapore limited liability partnership) which carries on a foreign law practice in Singapore (Singapore LLP). Under the arrangements with the Singapore LLP, the Singapore LLP provides legal and representation services to KWM Australia in the Southeast Asian region. KWM Australia also provides professional legal services and a range of support services to the Singapore LLP.

KWM Australia's relationship with the Hong Kong Partnership has also included the provision of some support services, the mutual exchange of professional legal services and the transfer of KWM Australia partners and employees to the Hong Kong office. KWM Australia does not own or control the Hong Kong Partnership or its operations.

KWM Australia's relationship with other parts of our global network includes:

- providing professional legal services to international clients;
- providing professional legal services to, and receiving professional legal services from, other King & Wood Mallesons offices, including offices located in the Peoples Republic of China, and the United States of America;
- the transfer of KWM Australia partners and employees to other King & Wood Mallesons offices; and
- receiving services from other entities within the network.

While our relationship with members within the King & Wood Mallesons global network is very important to KWM Australia and our clients, we do not control the foreign business operations of these independent member firms of King & Wood Mallesons.

WHAT WE PROCURE

KWM Australia procures goods and services to enable our delivery of services to our clients. Goods and services are sourced from both Australia and overseas.

We have 7 major expense categories:



Human resources and staff costs



Premises and operations



Professional Services



Insurance



Information Technology (Software and Hardware)



Hospitality



Travel and accommodation

We purchased goods and services from approximately 2400 suppliers and contractors in FY24. This number does not include suppliers from whom we purchase goods and services through staff corporate credit cards. Our supply contracts constitute a mix of one-off, short-term and long-term contracts.

WHERE WE PROCURE FROM

Over 80% of our suppliers and contractors are based in Australia and comprise mostly professional services personnel (eg barristers, expert witnesses, technical specialists), sophisticated commercial suppliers and our KWM member firms. We take steps to identify and assess modern slavery risks associated with our suppliers irrespective of whether they are in Australia or overseas, as outlined in [Sections 3](#) and [4](#).

Our data shows that the bulk of the remaining suppliers or contractors for FY24 (excluding those engaged via credit card purchases) were based in Singapore, United States of America, United Kingdom, Hong Kong and New Zealand.

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OUR MODERN SLAVERY RISK AREAS

Our Modern Slavery Working Group reviews potential modern slavery risks in our operations and supply chains on a regular basis. The 6 key risk areas identified in our last statement remain the same in this Reporting Period.

No additional areas of risk have been identified.

RISK AREAS WITHIN OUR OPERATIONS

- **Workforce and recruitment:** we recruit staff in accordance with applicable employment laws and obligations. We use labour hire agencies to provide staff in limited circumstances. Agency staff may be short-term contractors or require a visa to work in Australia. We recognise the reliance on external recruitment agencies means that we have less visibility or control over the recruitment practices and employment conditions adopted by those organisations. As a consequence, this outsourcing of recruitment creates an element of modern slavery risk. We have processes in place to minimise this risk, including requiring recruitment agencies to comply with our Supplier Code of Conduct, which sets out our expectations on human rights.
- **Domestic contractor and service arrangements:** we procure services for the maintenance of our premises such as cleaning services, indoor plant maintenance, document production, printing services and casual labour hire such as contracted hospitality staff. Some of these sectors tend to employ workers from more vulnerable populations (eg migrant workers, base and semi-skilled workers, limited English-speaking capability). We identify this as a potential modern slavery risk for our business. We have due diligence processes in place and remain vigilant to identifying this type of risk. See [Section 4](#) for a review of the cleaning services supplied to our tenancies.

RISK AREAS WITHIN OUR SUPPLY CHAIN

- **Suppliers of suppliers:** our supply chain has multiple tiers, and we acknowledge that there are certain sectors and industries, products and services, geographic regions and supplier entities which carry a higher risk of modern slavery than others. While we can coordinate due diligence of our tier 1 suppliers and act where high-risk suppliers come to our attention, we have less immediate visibility or control of the business practices and operations of the suppliers of tier 2 suppliers and beyond. To mitigate this risk, we have strengthened the due diligence conducted for our tier 1 suppliers to ensure they have active modern slavery programs in place within their own businesses.
- **Offshore suppliers and contractors:** our offshore supply arrangements are varied and include legal services and software subscriptions. We also engage independent members of our King & Wood Mallesons global network (which are not controlled by KWM Australia) and other foreign law firms or professional services providers in countries where the perceived risk of modern slavery may be elevated (eg where a country has limited government response to modern slavery as identified in the Global Slavery Index 2023).
- **Procurement of goods for corporate functions on an ad hoc basis:** gifts or promotional goods are procured for corporate functions in a decentralised manner by individuals or teams within our business. Goods may be purchased in bulk (eg cups or notebooks) and due to the low cost involved, do not always undergo the same level of procurement due diligence as higher value contracts managed by our procurement team. While we still have procurement policies in place to govern purchases made by our staff, this risk can be elevated where the goods are purchased (directly) from overseas countries which have been identified as higher risk. We continue to place a strong focus on education and training of our staff about our procurement policies to mitigate this risk. See [Section 4](#) for a detailed review of this risk area.
- **Risk-based products identified for Australia:** the supply chain for electronic goods (laptops, computers and mobile phones) is generally considered a source of elevated modern slavery risk.² As a firm that procures electronic goods for use by our people, we perform due diligence during the tender process for our tier 1 suppliers and their supply chains and final vendors are chosen in respect of criteria that includes the existence of robust modern slavery policies and procedures. However, we recognise the inherent risks that may be present beyond tier 1 and tier 2 suppliers.

² Electronics were identified in the Global Slavery Index 2023 as one of Australia's top 5 categories of imported products at risk of modern slavery

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ASSESSING AND ADDRESSING MODERN SLAVERY RISK

ASSESSMENT OF MODERN SLAVERY RISK

We assessed the risk of modern slavery being present in our Australian business operations and supply chain for the Reporting Period to be low. This assessment was conducted by members of our internal Modern Slavery Working Group (which is made up of members from our Procurement, Strategy, Risk and Responsible Business teams).

We made this assessment by reviewing the 6 areas we identified as our key modern slavery risks within our operations and supply chain (see [Section 3](#) above) and actions taken to address these risks both this year and in previous reporting periods.

For our operations, we consider the risk to be low due to the processes we have in place that require recruitment agencies we contract with to meet the standards set out in our Supplier Code of Conduct (which requires suppliers to conduct their business in a fair and ethical manner free from corruption and exploitation). We use large reputable recruitment agencies who do not outsource to third parties. A review of our cleaning suppliers (a high-risk industry) revealed that our risk is low (see case study below). In addition, the legal industry more broadly is considered lower risk for modern slavery given the type of professional services that we provide. The Global Slavery Index 2023 also identifies Australia as lower risk in terms of its estimation of the prevalence of modern slavery and vulnerability to modern slavery.

For our supply chain, we also assess the overall risk to be low. In conducting a risk analysis, we reviewed our suppliers based on the country they are located in, their category of goods and services offered, and the volume of our spend. This analysis found:

- Over 80% of our suppliers are in Australia and represent 82% of our spend.
- For our Australian supply chain, the nature of goods and services procured are predominantly attributed to barristers, consultants, premises costs, staff benefits, technology and agents.
- After Australia, the top 4 locations where our suppliers are based are Singapore, the United States of America, Hong Kong and the United Kingdom, representing 9% of our suppliers and representing 16% of our spend. Of these top 4 overseas countries, the vast majority of the nature of goods and services procured were the provision of legal or professional services (eg consultants, agents) and premises.
- We identified 16 suppliers deemed 'high risk' by the Global Slavery Index 2023, based on their country of operation. These only attributed to 0.4% of our total expenditure and 0.7% of our total supplier list.
- For our staff credit card purchases, over 90% of the total expenditure could be traced to an Australian supplier. The bulk of this spend (more than 80%) relates to travel, entertainment, food and beverage expenditure. Just 2.25% of total expenditure could be traced to countries considered medium to high risk.
- Only 10 of our returned modern slavery vendor questionnaires received a high-risk score. The 10 vendors were made up of consultancy services (a low-risk industry), recruitment companies and technology companies (which are both subject to our formal due diligence procedures to minimise risk).

ACTIONS TAKEN TO ADDRESS OUR MODERN SLAVERY RISKS

We continued to implement our existing processes and controls to assess and address our modern slavery risks in the Reporting Period. Key actions taken in FY24 are set out below.

| AREA OF FOCUS | ACTIONS COMPLETED |
|---------------------------------|---|
| Supply chain and procurement | <ul style="list-style-type: none"> Completed Phase 2 of our vendor engagement program. This involved issuing our modern slavery questionnaire to a selection of new and existing vendors covering all aspects of their supply chain, policies and governance procedures. Vendors included overseas vendors and threshold expenditure was lowered to \$50k (previously \$100k for Phase 1). Members of our Procurement team attended meetings with industry groups, consultants and other independent procurement professionals to discuss approaches to manage modern slavery risk. Explored additional third-party provider software solutions to help us conduct due diligence and monitor risk aspects of vendors, including modern slavery risk. |
| Education and awareness | <ul style="list-style-type: none"> Annual completion of our in-house firmwide modern slavery e-learning module. Attendance at educational webinars on modern slavery by members of our Modern Slavery Working Group. Conversations with teams across the business on modern slavery and procurement of branded merchandise and event goods. Articles on modern slavery published on our external website and through client email alerts. |
| Partnerships and collaborations | <ul style="list-style-type: none"> Continued collaboration with the Australian Legal Sector Alliance and other member law firms. Pro bono legal work specific to combatting modern slavery and broader human rights issues. |
| Due diligence processes | <ul style="list-style-type: none"> Enhanced our existing due diligence on suppliers invited to tenders handled by our Procurement function – including a comprehensive review of questions asked on tenders, and risk weightings being applied to responses received. Continued to perform due diligence both before and during the vendor onboarding process, through a sub-set of modern slavery questions (for vendors not engaged through formal tender). Work undertaken to prepare policies and procedures on third party risk, along with preparation of training for our people on how to manage this risk. |

CASE STUDY

PURCHASE OF BRANDED MERCHANDISE AND CONFERENCE GOODS

Members of our Modern Slavery Working Group had consultations with various teams within our business that purchase goods for events, training and team activities. These goods range from branded merchandise and event collateral to gifts for speakers and special guests.

Examples of types of branded merchandise

- Water bottles and coffee cups
- Notebooks
- Leather compendiums
- Umbrellas
- Clothing (eg sports shirts and puffer vests)
- Stationery

Our conversations found that team members were broadly aware of factors they should consider prior to making purchases. This includes environmental sustainability and modern slavery considerations, as well as aligning purchases with the firm's commitment to supporting social enterprises and First Nations-owned businesses. Team members welcomed further training on what to look for from a modern slavery lens when making future purchases. A draft guidance checklist has been circulated to team members and further training will be provided as part of our commitments for FY25. A review of the teams' regular suppliers is ongoing.

More work will be done in FY25 to ensure that appropriate due diligence is being undertaken for the purchase of branded merchandise and ad hoc products.

CASE STUDY

CLEANING SUPPLIERS

To assess the risk of modern slavery being present in our cleaning supply chain, we asked the landlords of our building premises about their due diligence processes for cleaners and their engagement with the [Cleaning Accountability Framework \(CAF\)](#). CAF provides a certification that aims to end exploitation in property services and ensure workers' rights are respected, including access to fair wages and a safe workplace.

CAF works with cleaners and property owners to promote ethical labour practices in the cleaning supply chain and is recognised as a leading anti-slavery initiative by human rights and corporate responsibility experts. The framework is worker-centric, putting cleaners at the heart of the process and not relying solely on interviews with employers.

In addition to asking about CAF certification, we reviewed our landlords' modern slavery statements to assess their policies and procedures for addressing modern slavery risk in cleaning suppliers.

| OFFICE | FINDING | RISK ASSESSMENT |
|----------|---|-----------------|
| Brisbane | <ul style="list-style-type: none">• Landlord is a reporting entity under the Modern Slavery Act 2018 (Cth) and has 1 building in its portfolio that has achieved CAF certification. It applies strong due diligence processes to its cleaning procurement.• Cleaning supplier has CAF pre-qualified contractor status. | Low |

| OFFICE | FINDING | RISK ASSESSMENT |
|-----------|---|-----------------|
| Canberra | <ul style="list-style-type: none"> Landlord is a reporting entity under the Modern Slavery Act 2018 (Cth) and includes a modern slavery clause in its contract with cleaning supplier. The cleaning supplier is working towards CAF pre-qualification status and has worked with other landlords to achieve CAF certification at 4 buildings and is currently supporting certifications for another 11 buildings. | Low-Medium |
| Melbourne | <ul style="list-style-type: none"> Landlord is a reporting entity under the Modern Slavery Act 2018 (Cth), a member of CAF and the building has achieved CAF certification. Annual assessments are completed for ongoing CAF certification renewal | Low |
| Perth | <ul style="list-style-type: none"> Landlord and cleaning supplier are reporting entities under the Modern Slavery Act 2018 (Cth). The cleaning supplier is working towards CAF pre-qualification status and has worked with other landlords to achieve CAF certification at 4 buildings and is currently supporting certifications for another 11 buildings. | Low |
| Sydney | <ul style="list-style-type: none"> Landlord is a reporting entity under the Modern Slavery Act 2018 (Cth) and has 1 building in its portfolio that has achieved CAF certification. It applies strong due diligence processes to its cleaning procurement. Cleaning supplier has CAF pre-qualified contractor status | Low |

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ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

THE EFFECTIVENESS OF OUR ACTIONS IN FY24

In FY24 we set key performance indicators based on our key risk areas. We measure the effectiveness of our actions by tracking our progress against those indicators on an annual basis.

| FOCUS AREA | INDICATOR | RESULT |
|--------------------------------------|--|---|
| Education and awareness | Year on year increase in number of people completing our firmwide online modern slavery module | We experienced a decline in completion numbers in FY24 (312 vs 458 in FY23) |
| Risk assessment | Complete a modern-slavery focused review of at least 1 identified risk area (eg e-waste, cleaning, renovations, branded merchandise procurement) | <p>A review of the procurement of branded merchandise and event goods was conducted. See case study in Section 4 above</p> <p>A review of our cleaning supply chain was conducted. See case study in Section 4 above</p> |
| Supplier engagement | Collect data via our modern slavery questionnaire from active overseas suppliers and suppliers in high-risk industries in Australia | Modern slavery vendor questionnaires were sent out to suppliers. Risk ratings for all vendors were in the medium risk category |
| Remediation and grievance mechanisms | <p>100% of incidents reported remediated or resolved</p> <p>Reporting mechanisms in place are accessible and effective</p> | <p>Zero modern slavery incidents reported through our incident response policy or anonymous reporting platform</p> <p>Reporting mechanisms have been tested and found to be robust, accessible and effective at enabling our people to report a modern slavery incident</p> |

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LOOKING FORWARD TO FY25

KWM Australia aims to continuously improve our approach to combatting modern slavery risks in our operations and supply chains.

OUR FOCUS FOR FY25

PROCUREMENT AND RISK ASSESSMENTS

- Selection of a new procurement software platform. Part of the selection process will be to find a new vendor onboarding module which elevates our due diligence and risk assessment capabilities
- Expand the scope of our annual modern slavery supplier questionnaire, with a view to increasing the vendor completion return rate
- Broaden our processes to cover third party risk assessments, including but not limited to modern slavery third party risks

EDUCATION AND TRAINING

- Provide targeted training to our Events Team, Early Careers Team and Practice Assistants in conducting due diligence and identifying modern slavery risks in the ad hoc purchase of goods and services related to events, training and team activities
- Deliver awareness sessions to all budget owners across our shared service and support teams (as part of our new Responsible Business Blueprint) to increase knowledge of our modern slavery obligations

PREMISES

- Undertake a review of modern slavery risks associated with our facilities waste management, including e-waste management

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OTHER RELEVANT INFORMATION

We recognise that modern slavery is strongly linked to other human rights and societal issues such as gender and discrimination, poverty, education, climate change and environmental sustainability issues.

In FY24 we developed a comprehensive Responsible Business Blueprint, which sets out our best practice responsible business framework. The aim of the framework is to communicate to our people exactly what Responsible Business means to us at KWM, what we want to achieve and how we are going to achieve it. This framework has been endorsed by our Executive Team.

Our modern slavery response forms part of our Responsible Business Blueprint, with a clear goal to strive for responsible and sustainable procurement, underpinned by our broader objective to maximise our positive impact and minimise any negative impact on people and planet.

In addition to modern slavery, our Responsible Business framework includes the following:

- Community Pillar (Pro Bono & Social Impact), which delivers pro bono legal advice to community organisations on their modern slavery reporting obligations
- Community Pillar (Pro Bono & Social Impact) also designs, develops and delivers Fairer Futures programs to provide or assist young people to secure meaningful and fair employment
- a robust set of policies that aim to discourage behaviour that may have a direct or indirect impact on modern slavery, such as our Anti-Bribery and Corruption Policy
- delivering seminars, tailored presentations and publishing publicly available resources on our website on the topic of modern slavery and associated risks, which help organisations understand their role and obligations and what services we are able to provide.

These measures demonstrate the effectiveness and importance of collaborating with communities and stakeholders to raise awareness of, and contribute to, combating modern slavery.

PRO BONO WORK SPECIFIC TO COMBATTING MODERN SLAVERY

In FY24 we assisted The Smith Family with the drafting of their Modern Slavery Statement, including advising the organisation on its modern slavery work program and broader modern slavery risk mitigation measures.

PRO BONO WORK ON BROADER HUMAN RIGHTS MATTERS

- Involvement in clinics assisting individuals who are unable to afford legal representation, run by Justice Connect Homeless Law, Refugee Legal (Melbourne), LawRight (Brisbane), Refugee Advice and Casework (Sydney), Street Law Centre WA (Perth)
- Advisory work for Human Rights Law Centre, Justice and Equity Centre, Kaleidoscope Australia Human Rights Foundation, National Justice Project
- Assisted National Justice Project with preparing fact sheets to educate individuals who have experienced discrimination or injustice to make complaints to the appropriate complaints body
- Advised various governance and real estate aspects of the Wilya Junta Housing Collaboration which provides culturally safe and climate appropriate housing for remote Aboriginal communities

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CONSULTATION AND BOARD APPROVAL

This statement was prepared through consultation with a team of representatives from our Procurement, Risk, People & Development, Business Services, Strategy and Responsible Business functions, which consisted of staff from the reporting entities covered by this Statement. This statement was also reviewed by the Office of General Counsel and lawyers in our firm specialising in modern slavery risk.

KWM Australia does not own or control any of the other entities within the global KWM network.

The King & Wood Mallesons Australia Board approved this statement on behalf of the Australian partnership on 4 December 2024.

The board of directors of Dabserv Pty Ltd approved this statement on 18 December 2024.

KING & WOOD
MALLESONS
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JOIN THE CONVERSATION



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