



# Holding Redlich

## Modern Slavery Statement



This Modern Slavery Statement (Statement) is made jointly by the Holding Redlich Partnership (ABN 15 364 527 724) and Justice Services Pty Ltd (ABN 15 005 249 874). References to 'we', 'us', 'our' or the 'firm' are references to those entities. This statement sets out the steps that we have taken to ensure that modern slavery and human trafficking is not taking place within our operations or our supply chains. This statement is made pursuant to the Australian Modern Slavery Act 2018 with respect to the financial year ending 30 June 2023.

This statement was reviewed and approved by the Executive Committee of Holding Redlich in its capacity as principal governing body of Holding Redlich and the Directors of Justice Services Pty Ltd on 13 December 2023.



## INTRODUCTION

Holding Redlich is committed to upholding human rights and firmly believes that there is no room for any form of modern slavery within the operations of any ethical business, particularly a business whose focus is on providing access to justice. We continue the fight against modern slavery by applying best practice principles to ensure ethical and responsible procurement in our supply chains and operations. Extending to our suppliers and clients, we have set high standards and clear expectations about the way we conduct our business.

This is our third Modern Slavery Statement made pursuant to the requirements of the Modern Slavery Act 2018 (Cth) (Act). It has been prepared in respect of the year 1 July 2022 to 30 June 2023 (**Reporting Period**). It expands and draws on our previous statements and extends our sophistication and dedication to the highest ethical standards and sets out the approaches we are taking to reduce the risk of modern slavery practices within our supply chains and operations.

This modern slavery statement addresses each of the mandatory criteria in section 16 of the Modern Slavery Act, as outlined in the table below.

Mandatory criteria for modern slavery statements	Page of this Statement
Identify the reporting entity	1
Describe the reporting entity's structure, operations and supply chains	2, 3
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	3, 4
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	4
Describe how the reporting entity assesses the effectiveness of these actions	5
Statement endorsement	6

Modern slavery refers to cases of serious exploitation, including where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Modern slavery impacts men, women and children and includes situations where individuals are forced to work against their will under threat.

## OUR STRUCTURE

Holding Redlich is a national, commercial law firm with offices in Melbourne, Canberra, Sydney, Brisbane and Cairns.

We also operate out of several suburban offices in Victoria for our personal injury practice, under the trading name of Redlich's Work Injury Lawyers (formerly Adviceline Injury Lawyers). We comprise around 500 people, including 60 partners. As a law firm, Holding Redlich operates as a partnership, led by our National Managing Partner, Troy Lewis, and our Executive Committee. The Executive Committee manages the strategic direction of the Firm.

The Holding Redlich Partnership is owned by the partners of the firm, and operates under the trading name, Holding Redlich. Justice Services Pty Ltd (**Justice Services**) is an operational entity that provides support services to the Holding Redlich Partnership in accordance with a services

agreement between both entities. Justice Services employs all non-legal staff and attends to the administration associated with Holding Redlich (i.e. premises leases, utilities, purchasing, printing and stationary, asset leasing, payroll).

The firm's business services functions including: finance; marketing; operations; human resources; information technology; knowledge management, quality and risk, are run by our National Business Services Managers who report to our Chief Executive Officer. Our Chief Executive Officer, in turn, reports to our National Managing Partner and Executive Committee.





**OUR VALUES**

Holding Redlich's legal practice is underpinned by a promise to uphold human rights and promote social justice. Consistent with our values and culture, we are strongly committed to pro bono and community work, to support access to justice for the most disadvantaged and vulnerable and minimising our impact on the environment. Integrity, confidentiality, ethics and trust are at the core of everything we do. At Holding Redlich we are committed to creating an environment that values the contribution of all our partners and staff.

Holding Redlich is also a member of the Australian Legal Sector Alliance (AusLSA), and we align with their goals of promoting best practice sustainable and inclusive workplaces, community support, environmental conservation and responsible governance which includes sustainable procurement and modern slavery commitments.

**OUR OPERATIONS**

As a professional service firm, our principal activity is the provision of legal services to our clients. The conduct of our lawyers is regulated by the legal profession legislation and regulations in each Australian state or territory in which we operate, therefore we consider the risk of having modern slavery occurring within our organisation is very low.

As our operations are based only within Australia, the majority of our suppliers are staff and consultants we engage or retain in Australia. We have a well-established human resources framework of policies and procedures to ensure compliance with labour laws regarding their working conditions and remuneration, with a range of policies and management practices in place to support our operations. We therefore consider the risk of causing modern slavery in our operations to be very low.

Given Holding Redlich's unique position providing expert legal advice to a wide variety of client in a number of industries, the firm has both the opportunity and impetus to strengthen their approach to modern slavery and human rights which will in turn support the legitimacy of our modern slavery advisory services.

**OUR SUPPLY CHAINS**

Operating in the professional services sector, Holding Redlich procures goods and services for the purpose of managing and delivering legal

services. The sourcing and purchasing of goods and services is undertaken by each office and is supported by a centralised finance department.

The majority of goods and services that we procure come from suppliers based in Australia. We do not regularly source goods or services internationally. The main categories of goods are services that we procure (directly and indirectly) include:



**Information and communications technology:**

computer hardware and software, cloud services, virtual data room services, virtual document exchange services, printers, audio/visual equipment and services, desk phones and mobile phones



**Real estate and related property management services:**

rental and facilities management and office fitouts



**Office services:**

this includes supply of our office furniture and fitouts, stationery and branded items, knowledge subscription services, document archiving and management services and courier and postal services as well as equipment maintenance and document printing services



**Professional services:** taxation, external legal counsel, consulting services and professional development, training providers and employee programs



**Financial and Insurance services:** banking and brokerage services



**Mobility and travel:** domestic and international travel bookings and accommodation bookings



**Hospitality and catering:** onsite and offsite catering and events.

**OUR RISK AREAS**

Holding Redlich's core operations are delivered by staff employed or engaged in Australia. We comply with all applicable Australian labour laws regarding working conditions and remuneration, with a range of policies and management practices in place to support operations.

Holding Redlich considers the risk of modern slavery in our operations to be very low as due to our commitment to operating in compliance with our human resources framework (as described above) and as result of Modern Slavery





Risk Assessment and our ongoing engagement with our suppliers.

We have not identified any specific instances of modern slavery and our analysis has found that most tier one suppliers pose a low overall risk of modern slavery. However, we recognise that there is a risk that we, like other businesses, may be directly linked to the modern slavery practices of other entities deep within our supply chain, including entities with which we do not have a direct contractual relationship.

We consider that our supply chains present a higher risk of modern slavery than our core operations.

**Our partnerships with experts**

We expect all suppliers to comply with applicable laws, including modern slavery legislation and laws regarding working conditions and remuneration. As part of our commitment to eliminating modern slavery, during the reporting period, Holding Redlich has taken positive steps towards obtaining a deeper understanding of the risk of modern slavery in our supply chain and combating these risks.

Through our engagement with Edge Environment Pty Ltd (Edge), we have undertaken a Modern Slavery Risk Assessment to identify those external suppliers who may be at higher risk of modern slavery within their operations. We have engaged directly with those higher risk suppliers to ensure that they meet the necessary standards to combat modern slavery.



Based on FY21 spend data Edge identified that the following categories were found to have a very high potential of modern slavery risk within their supply chains. This does not imply that modern slavery risk is inherent in these products and services but prompts a proportional level of due diligence required to identify and manage risk at the supplier and contract level.



**Information and communications technology**

There is a risk of modern slavery in the manufacture and assembly of electronic devices such as laptops, keyboards, mice and headsets commonly used in professional service businesses in jurisdictions that have poor labour conditions and/or use child labour. Our visibility of these risks relies on suppliers providing information on their standards and risk management and compliance systems.

We procure most of these goods and services from multinational IT companies whose modern slavery statements are publicly accessible. In the case of smaller sized suppliers we require those suppliers to become a signatory to our Supplier Code of Conduct (Code).

**Office Renovations**

During the Reporting Period our procurement in this category related mainly to office fit-outs. We recognise that the subcontracting of base-skill labour is a factor that heightens the risk of modern slavery in this category.

We engage quality builders who are aware of the modern slavery risks within their industry and have policies and controls in place to reduce the





risks. We also recognise the risks in the materials and labour used in manufacturing processes, and the possible high-risk geographic location of their manufacture. We prioritise procurement from local manufacturers, particularly of finished goods such as loose furniture and workstations, and we intend to prioritise procurement of locally or Australian produced raw building materials by our builders/subcontractors in future construction projects, wherever possible.

**Cleaners**

We are aware that there is an increased risk of modern slavery among labour hire providers of unskilled workers such as those involved with cleaning. We have limited visibility in this space as the cleaners are procured by our property managers under our tenancy arrangements. We have not identified any modern slavery misconduct in this area within our supply chains.

**Accommodation, food, entertainment**

This category includes hospitality and catering services used for our events. We must consider that providers in this sector may also rely on base-skill labour procured through outsourcing arrangements and that food industry supply chains have a high risk of modern slavery.

**Opportunity for impact**

We have more opportunity to influence change with suppliers we have leverage and long-term relationships with. For this reason, we have prioritised the following three categories that represent focus areas for more targeted due diligence measures but also present opportunities to use our buying power to generate social value above and beyond the value of the goods or services being procured.



To ensure compliance we have requested those suppliers whom we have identified as being our high-risk suppliers (tier one suppliers) who do not lodge their own Modern Slavery Statement, to become a signatory to our Code. Our Code, based on the Responsible Business Alliance Code of Conduct 7.0 effective 1 January 2021, sets out the minimum standards of behaviour we require of our suppliers. It includes a set of social, environmental and ethical industry standards

which has been prepared with reference to international norms and standards including the Universal Declaration of Human Rights, ILO International Labour Standards, OECD Guidelines for Multinational Enterprises and ISO and SA standards. Our Code is applicable to all contract suppliers. Suppliers are expected to not only comply with the Code but to also implement this Code in their own supply chain.

**ASSESSMENT AND ACTIONS TO ADDRESS MODERN SLAVERY RISKS**

**Our Modern Slavery Committee - Clear lines of reporting**

Our governance structure and policies provide the foundation for our response to modern slavery risks. They ensure responsibility for managing modern slavery risks are clearly allocated across business units and enable us to take a consistent and strategic approach. Our Modern Slavery Committee, overseen by our Risk Management Committee, continues to work to implement and improve our compliance with modern slavery obligations.

Our Modern Slavery Committee comprises representatives from Operations, Finance, Risk and Compliance and internal expertise in Modern Slavery.



**SUPPORTING POLICY COMMITMENT**

We are committed to respecting the rights of individuals within our supply chain and reject modern slavery in all its forms. To support this commitment, we have developed company policies that all employees must comply with that support the objectives of the Modern Slavery Act, including the following:



## Anti-bribery/anti-corruption Policy

The purpose of this policy is to establish controls to ensure that Holding Redlich fully complies with all applicable anti-bribery and corruption regulations, and to ensure that Holding Redlich's business is conducted in a socially responsible manner. Holding Redlich has a culture based on mutual respect and honesty and has policies in place to ensure that we operate in an ethical and fair manner with our colleagues and clients. This applies to all our partners, consultants, contractors and employees, as well as associated third parties such as suppliers, and sets out rules with regard to minimising risks of bribery and corruption.

## Whistle-blower Policy

At Holding Redlich we value that our firm is based on a culture of trust, honesty and ethical behaviour. Our firm's policies emphasise the importance of speaking up as a critical component of our values. Whistleblowing refers to a partner or employee speaking out about an activity which they believe violates ethical or legal norms. It can be defined generally as the honest disclosure of information in the public interest about serious wrong doing in an organization to an authority which can bring about an investigation and remedy the situation. The firm has engaged an external consultant, Deloitte, to provide a confidential hotline service that accepts calls or emails from Partners or employees wishing to report possible illegal, unethical or improper conduct.

## Code of Conduct

The purpose of the Holding Redlich Code of Conduct is to bring all of the policies which specify the behaviors we expect of one another and key policies and expectations we would like to see in our firm.

## HOW WE ASSESS THE EFFECTIVENESS OF OUR ACTIONS AND OUR NEXT STEPS

In 2022 we strengthened our relationship with Edge to undertake a more in-depth review and undertook the follow actions:

Gap & opportunity analysis including:

- a review of our existing policies and processes
- Stakeholder survey
- Supplier code of conduct review; and
- prepared a gaps and opportunity report.

From this information, we worked with Edge to produce a Responsible Sourcing framework.



Developed in accordance with the Act, the Responsible Sourcing Framework guides employees in purchasing goods and services with the aim of performing thorough due diligence and safeguarding vulnerable individuals within supply chains. This includes the creation of a Due diligence Tool to be applied to new suppliers and proposed remediation processes going forward.

Finally, Edge conducted training of our business leadership team and other members of staff responsible for purchasing decisions on the implementation of the Responsible Sourcing framework and the risks of modern slavery within our supply chains.

## Remediation process

In the next reporting period we aim to implement a remediation process, which is a critical component of Holding Redlich's response to modern slavery risks within our organisation and supply chain. This will provide a framework of actions required to safeguard individuals, remediate harm and address root causes of human rights violations. The process will align to our internal grievances systems as the recommended next steps to take when indicators of serious exploitation are uncovered. As remediation of modern slavery always requires a collaborative response from industry groups, law enforcement and survivor support services, our approach identifies key stakeholders alongside each step.

Aligning with the United Nations Guiding Principles, (our response will be proportional to the severity of impacts to people (or potential impacts) and our firm's relationship to harm (whether we have caused, contributed to or are directly linked to the issues).





While this framework provides a guideline to help inform action, remediating modern slavery harm is context specific and an appropriate response will depend on the circumstances of each case and the interests of the stakeholders involved.

**CONSULTATION AND STATEMENT APPROVAL**

The reporting entity for the purpose of this statement is the Holding Redlich Partnership, (N A Ackroyd & Others ABN 15 364 527 724) and Justice Services Pty Ltd (ABN 15 005 249 874). This statement and all actions referred to in have been completed by both Holding Redlich and business services representatives of Justice Services Pty Ltd.

This statement was prepared by our Modern Slavery Subcommittee, reporting to the Holding Redlich Executive Committee. The Statement was reviewed and approved by our Executive Committee as principal governing body of Holding Redlich and the Directors of Justice Services Pty Ltd on 13 December 2023.

**Signed by:**



**Troy Lewis**

National Manager Partner Holding Redlich and Director Justice Services Pty Ltd



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