

# 2022 Modern Slavery Statement

December 2022

*We would like to acknowledge the traditional custodians of the lands on which we live and work. We would like to pay respect to the Elders of these lands, both past and present, and extend that respect to all Aboriginal and Torres Strait Islander Peoples and First Nation Peoples globally.*

This statement is made on behalf of Norton Rose Fulbright Australia and Norton Rose Fulbright Australia Services Pty Ltd (ABN 32 720 686 049) pursuant to section 14 of the *Modern Slavery Act 2018* (the Act) and constitutes our modern slavery statement for the financial year ended 30 June 2022 ("Reporting Period"). Where we refer to "NRFA", "we", "us", "our" or the "firm" in this statement, it means Norton Rose Fulbright Australia, Norton Rose Fulbright Australia Services Pty Ltd and other entities owned or controlled by Norton Rose Fulbright Australia Group Pty Ltd as trustee for the equity partners of Norton Rose Fulbright Australia.

As providers of legal services, we have a responsibility to uphold the rule of law and respect human rights. We support and respect internationally recognised human rights, and are committed to mitigating the risk of modern slavery within our operations and supply chain.

Wherever we are, we operate in accordance with our [Business Principles](#) of Quality, Unity and Integrity. These Business Principles guide our activities and staff across our offices. They describe our culture, the way we work and what we stand for. We value our people and promote a culture of respect for the individual.

This statement illustrates how we continue to strive to apply our Business Principles in practice, and reflects our continued public commitment not to use forced, compulsory, trafficked or child labour within our organisation, and to challenge and confront use of such labour within our supply chains.

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## Our structure, operations and supply chains

### We have offices across Australia, in Brisbane, Canberra, Melbourne, Newcastle, Perth and Sydney.

Norton Rose Fulbright Australia provides legal and advisory services to clients, while Norton Rose Fulbright Australia Services Pty Ltd provides ancillary services to support the activities of Norton Rose Fulbright Australia. Norton Rose Fulbright Australia Group Pty Ltd has a number of subsidiaries, which are non-trading and do not have employees.

Norton Rose Fulbright Australia, Norton Rose Fulbright US LLP, Norton Rose Fulbright LLP, Norton Rose Fulbright Canada LLP and Norton Rose Fulbright South Africa Inc are separate legal entities and all of them are members of Norton Rose Fulbright Verein, a Swiss verein. Norton Rose Fulbright Verein helps coordinate the activities of the members but does not itself engage in the practice of law or other business.

We also have associations or alliances with other organisations such as the law firms Jaramer Legal (in which we also have a minority shareholding) in Australia and TNB & Partners in Indonesia. Jaramer Legal is Australia's first national majority Indigenous-owned law firm that provides a broad suite of corporate and commercial legal services. TNB & Partners is a law firm based in Jakarta that provides legal services in corporate and commercial, banking and finance and dispute resolution.

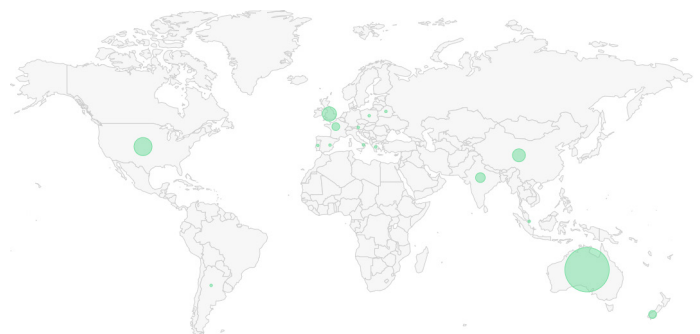
Our principal activity is the provision of legal and advisory services to business enterprises, governments and other public sector organisations. We are focused on six key industry sectors:

- consumer markets;
- energy, infrastructure and resources;
- financial institutions;
- life sciences and healthcare;
- technology; and
- transport.

Our total head count is approximately 841<sup>1</sup> comprising 511 females, 329 males and 1 non-binary person. Our workforce predominately comprises legal professionals, supported by embedded business services, technology, finance, legal operations, payroll, administrative and HR teams. The majority of our workforce is engaged on an ongoing basis. We utilise a very small pool of contractors, casuals and external consultants. In addition to the National Employment Standards described further in point (c) in Annexure A of this Statement, staff salaries are reviewed annually against the local market data for their role, and the market data is provided by Mercer twice annually.

Our suppliers include suppliers of IT and communications equipment and services; property; office cleaning and other facilities management services; transport such as airlines and couriers; marketing such as merchandise suppliers and conference providers; office equipment and supplies; and professional services such as auditors, accountants, consultants, legal counsel, banks, insurers, recruitment agencies, education and training service providers and medical services providers. We also have some suppliers that provide legal or other services which are used by us in the provision of services to our clients, primarily barristers. Our suppliers are primarily domiciled in Australia, but also include global entities that supply Norton Rose Fulbright globally.

The geographic footprint representing where suppliers have business operations is shown below. It represents the locations in respect of the suppliers that completed our Modern Slavery Questionnaire (MSQ) in 2022.



<sup>1</sup> This figure includes partners, employees and contractors.

## Modern slavery risks in our operations and supply chains

### Our operations

We assess the potential for our operations to cause, contribute to, or be directly linked to modern slavery on an ongoing basis. We consider the overall risk of modern slavery in our operations to remain low for the reasons described in our previous modern slavery statements, namely, the lower risk profile associated with the legal services sector, the lower prevalence of modern slavery in Australia and the robust processes we have in place in relation to workplace relations. Our workforce composition is not subject to significant changes from year to year which is why the description of risk in this section remains unchanged from our previous statements.

We follow set protocols in the way we recruit people into the firm via our recruitment practices. For example, we verify qualifications, conduct reference checking on prior experience, and verify the right to work in our country. We continue to monitor and engage with our staff on issues such as work hours and overtime, to ensure they are adequately compensated and we monitor any excessive work patterns.

We remain confident that the level of risk of modern slavery in Jaramer Legal, given the nature of its services and the jurisdiction in which it operates, remains low.

With respect to TNB & Partners, although Indonesia is a higher risk jurisdiction for modern slavery than Australia, we do not consider our association with that law firm links us to human rights impacts. This is because of the nature of the professional legal services provided by TNB & Partners.

### Supply chains

We have also assessed the potential for our business to cause, contribute to, or be directly linked to modern slavery via our supply chain. Given the nature of our procurement categories and practices as described in further detail below, it is unlikely that we have caused or contributed to modern slavery in our procurement of goods or services during the Reporting Period. There is, however, the latent risk that we may be connected to modern slavery practices through the activities of our suppliers and their supply chains.

Our supply chain comprises the main categories listed in the table below. Modern slavery risks are likely to exist in each one of them by virtue of the industry risk profiles and the globalised and often complex supply chains supporting the provision of goods or services. Our supply chain profile remains largely the same year-on-year, and as a result, the descriptions of risk from previous years remains current:

Category	Generally known modern slavery risks <sup>2</sup>
IT equipment and software	Modern slavery risks are present in the supply chains that provide IT companies with the necessary materials to produce electronic goods, and parts of those goods. The manufacture of IT equipment has also been linked to modern slavery.
Cleaning and laundry	The cleaning industry is considered high-risk for modern slavery largely due to the nature of the workforce and the often opaque nature of operations. The cleaning sector does not require a qualification in many instances and as such the workforce is often low-skilled and not fluent in the local language.
Hospitality and food services	Food related supply chains have a high risk of modern slavery. These risks are not only a concern for supermarkets and suppliers generally, they should also be considered by producers, distributors and caterers.

<sup>2</sup> The risks outlined in this table are general and do not relate to any actual instances of modern slavery in the supply chain of our first tier suppliers.

Category	Generally known modern slavery risks <sup>2</sup>
Facilities maintenance	The prevalence of subcontracting in the facilities maintenance industry can lead to contractual liabilities and obligations diminishing to the point where the human rights of workers on site may go unnoticed due to a lack of transparency.
Corporate merchandise	The higher risk of modern slavery in the supply chains supporting the garment industry is well documented. The same can be said of mass produced items manufactured in higher risk countries with components from numerous locations.
Furniture	There are increased modern slavery risks associated with raw materials such as timber, PVC in flooring, fabrics, metals and glass as well as risks in the manufacturing industry located in higher risk countries.
Travel services	Although global travel management services are typically the first tier suppliers for large companies, hotels and airlines inevitably form part of the supply chain for purchasers of travel services. A vulnerable workforce supporting these industries combined with complex supply chains result in greater modern slavery risks.
Postal and Courier Pick-up and Delivery Services	The utilisation of subcontractors and agents that rely on base-skilled workers places the suppliers in this category at greater risk of being directly linked to modern slavery.

Based on the information gathered via our modern slavery questionnaire in 2022, our suppliers manufactured or procured goods and/or services from a range of countries including Australia, the United States, the United Kingdom, Singapore, China and India. Of these countries, the Fund for Peace Fragile States Index Methodology<sup>3</sup> scored China 9.7 out of 10 and India 7.4 out of 10 for human rights and the rule of law. Although these figures are not direct measurements of the prevalence of modern slavery, they provide insights into the conditions in which adverse human rights impacts, including modern slavery, can exist.

## Due diligence process and steps taken to assess and manage modern slavery risk

As a provider of legal services, a purchaser of goods and services and also an employer, we recognise our responsibility under the UN Guiding Principles on Business and Human Rights in *all* areas of our practice. Accordingly, we continue to assess and address modern slavery risks across three levels of our business, namely, operations, client services and supply chain. Our existing policies and procedures are set out in **Annexure A**. During the Reporting Period, the policies and procedures were operational.

### Our operations

We remain firmly committed to combatting modern slavery in all forms, and we continue to strive to identify any actual or potential modern slavery risks occurring within our business. An overview of the actions we have taken to assess and manage modern slavery is set out below:

- We continued to monitor the reports made via our **whistleblowing channels** and confirm that we did not receive any reports of actual or suspected violations of our Human Rights Policy or which otherwise gave rise to cause for concern relating to human rights during the Reporting Period.
- We **communicated** with our people to recap our firm's commitment to respecting human rights in our operations and supply chain.
- We updated our firm-wide mandatory online **Human Rights Training** designed to increase awareness of how to recognise red flags for modern slavery. By the end of the Reporting Period, approximately 77.3% of all staff in Australia completed the updated training.

<sup>3</sup> Fragile States Index (2022) <https://fragilestatesindex.org/global-data/>

## Client services

As stated in our Human Rights Policy, we continue to assess potential human rights impacts and consider these when opening new client matters. All new clients are subject to checks that identify any high risk industries in which they operate. We review clients' annual reports where available, conduct internet searches and use a subscription database to identify financial crime convictions and adverse media reports. If a client's industry is regarded as high risk for human rights issues, our searches are more extensive. Our review of clients during the Reporting Period did not identify clients requiring further human rights due diligence beyond our usual checks.

Our monthly email to partners and senior lawyers seeking disclosure of risks in relation to our client services specifically requires that any circumstance of breach of our Human Rights Policy, as well as any cause for concern relating to human rights in any part of our supply chain, be reported. Our partners and senior lawyers have not raised human rights issues in relation to our client services (or our supply chain) during the Reporting Period.

Through our advisory work and the sharing of best practice between our Business Human Rights team and our other practice areas, we have continued to support our clients' understanding of human rights issues and impacts, including modern slavery. During the Reporting Period, we updated our modern slavery and human rights precedent clauses for use in supplier contracts.

Our Business Human Rights subject matter experts have presented at numerous roundtables and webinars for clients and external audiences in relation to modern slavery, human rights due diligence and best practice. This education role is part of our commitment to improve the understanding of the responsibility of business to respect human rights.

In addition to our ongoing efforts to raise awareness of modern slavery risks, many of our clients have required us to comply with their supplier codes of conduct, which address modern slavery risk. During the Reporting Period, we continued to cooperate with the risk assessment measures requested by our clients as and when required. In recognition that we form part of supply chains of other reporting entities, we responded to modern slavery questionnaires issued to us by our clients and when engaging with clients on new matters we provided details of our human rights due diligence and other information regarding our modern slavery risk profile.

## Pro bono practice

We have also contributed to upholding human rights, and more specifically preventing modern slavery, via the work that we have undertaken with our clients in our pro bono practice this year. Our engagements have included advising the Clean Energy Council, on a pro bono basis, in relation to identification and management of the risks of modern slavery in the renewables sector and facilitating their Modern Slavery Working Group.

In the Reporting Period, we assisted Anti-Slavery Australia with research and advice on the extent to which 'coercive control' is recognised in the context of existing Australian legislative regimes dealing with modern slavery crimes and whether further legislative reform is necessary. We also assisted Anti-Slavery Australia in its advocacy for a national compensation scheme for victims of modern slavery. One of our lawyers also completed a secondment with Anti-Slavery Australia. In addition, our lawyers continue to support individual clients referred by Anti-Slavery Australia. For example, we assisted a client who was the victim of modern slavery to be reunited with her children in Australia and apply for permanent visas.

During the Reporting Period, our firm developed a new pro bono strategy. As part of this new strategy, modern slavery is included as a focus area and the firm will continue to work on pro bono projects that address modern slavery. Our firm will also continue to take referrals and place secondees at non-profit organisations that work in the modern slavery space.

## Supply chain

On a periodic basis, we review and revise our internal procedures to improve the way we assess, address, mitigate and prevent the risk of modern slavery occurring within our supply chain. We do this in recognition of the fact that striving to do better is the only way to bring about impactful change in the way we embed human rights considerations in our procurement processes.

Our core procurement processes for assessing and managing modern slavery and human rights impacts have remained stable for a number of years. This year we undertook a detailed assurance program to monitor compliance with our procurement policies and procedures. Undertaking assurance checks is an important part of ensuring our systems are effective. Following this assurance program, we held two training sessions designed for staff with a procurement function as a refresher on the

application of our Supplier Contracts Policy and the process by which we conduct modern slavery due diligence on new suppliers at onboarding via the ethiXbase platform.

In summary, our due diligence process required:

- the consideration of the human rights impacts of a supplier's provision of goods or services to us both at the time of first selecting the supplier and upon renewal or extension of the contract with the supplier;
- all suppliers to confirm in writing their compliance with our Supplier Charter<sup>4</sup> or an equivalent document (for example, the supplier's own supplier charter) that is approved by our General Counsel. Our Supplier Charter sets out our expectations of suppliers in respect of anti-bribery and corruption, diversity and inclusion, health and safety, sustainability and human rights. In respect of human rights, it provides that our suppliers, whether directly or through their supply chain, must comply with all applicable human rights related laws in respect of their employees; conduct their business activities in a manner which respects human rights as set out in the UN Universal Declaration of Human Rights and the core conventions of the International Labour Organization; not hold another person in slavery or servitude, employ, engage or otherwise use forced or compulsory labour, trafficked labour or child labour; and not engage in or condone the use of corporal punishments or mentally, physically or sexually abusive or inhumane treatment of workers; and
- that suppliers meeting our internal procurement annualised spend threshold, and all suppliers providing goods and/or services relating to courier services, food and food related goods and services and/or cleaning services, complete an online MSQ.

We continued to use the MSQ on the ethiXbase platform as a key part of our modern slavery due diligence program. We observed an improved completion rate by our suppliers, an approximately 20% increase in the number of suppliers with a policy on human rights or anti-slavery and a just over 6% increase in the number of suppliers that have undertaken a human rights impact assessment. All suppliers that provided goods or services during the Reporting Period that completed the MSQ confirmed that they would comply with our Supplier Charter.

## Corporate merchandise

Although we procure our corporate merchandise from an Australian business, we recognise that there are risks associated with the products manufactured offshore using components and materials from countries that may have greater exposure to adverse human rights impacts. In an effort to better understand the process by which NRF branded merchandise, including umbrellas, notepads, pens, sports singlets, drink bottles, gift bags and ribbon, is made, we sought information from our supplier in relation to sourcing practices and required it to ask further questions of its suppliers.

Our supplier informed us that:

- it contracts with importers who are all members of the Australasian Promotional Products Association (APPA);
- it conducts due diligence checks whenever it goes to market to look for a new supplier by asking for a copy of their codes of conduct (or equivalent policies) relating to modern slavery;
- the importers of products supplied to us do not source products from Xinjiang which has been the subject of allegations relating to forced labour.

Given the longevity of our business relationship with our supplier of branded merchandise, we used our leverage to obtain further information and reiterate our ethical sourcing requirements for all products supplied to us.

<sup>4</sup> <https://www.nortonrosefulbright.com/en/global-statement/suppliers>

The average modern slavery risk rating for suppliers that completed the MSQ remained unchanged at 3/10, which is low. No supplier that completed the MSQ was allocated a high risk rating. The suppliers that received a moderate risk rating (between 5 and 7) operated predominately in Australia and in the following higher risk sectors but they each responded that they had controls or policies in place, including training:

- building cleaning, pest control and other support;
- repair and maintenance;
- telecommunication services;
- food and beverages;
- manufacturing, including corporate merchandise;
- postal, courier and delivery services.

## Office cleaners

Our offices and facilities are one of our most significant categories of expenditure and hold some of the more salient risks of modern slavery in our supply chain. Cleaning work in particular is a higher risk services sector where multiple tiers of contracting often obscure labour conditions, and the base-skilled nature of work can result in workers being exploited.

In light of this, we took a closer look into each of our landlord's cleaners for our offices in Australia. In summary, we issued the MSQ to all landlords. We then reviewed the responses provided by the landlords and identified areas requiring further engagement which formed the basis of our follow up correspondence. We met with one of the landlords to go through the results of our risk assessment in more detail and to obtain information on how they assess and address modern slavery risks. We also prepared a 'Speak Up' poster to be displayed in our offices to raise awareness of modern slavery red flags and provide useful independent contact details.

## Assessing the effectiveness of our actions

In our third year of reporting pursuant to the Act, we have continued to assess the effectiveness of our actions by reference to the goals we set for the next reporting period and tracking our progress against those goals.

During the course of the next reporting period, we will seek to review, monitor and embed our processes as follows:

Goal	Status	Future goals
Assess the number of our suppliers which have adopted a human rights or modern slavery commitment, whether by agreeing to our Supplier Charter or otherwise	Ongoing	We have observed an increase in the proportion of suppliers agreeing to our Supplier Charter as compared to the previous reporting periods. We will continue to monitor the compliance of our suppliers.
Identify the suppliers requiring further due diligence following the MSQ results and develop remediation plans in conjunction with the supplier(s) as and when required	Ongoing	We identified cleaners and providers of branded merchandise as suppliers requiring further due diligence. We will review the MSQ results from the next reporting period and assess the need to conduct any additional deep dives.



Goal	Status	Future goals
Consider the modern slavery statements of suppliers and prospective suppliers (where available) when making procurement decisions	Ongoing	During the next reporting period, we will provide guidance to our staff with a procurement function on how to incorporate the review of modern slavery statements in the decision making process.
Continue to monitor the reporting channels for any reported instances of human rights impacts in our operations and supply chains	Ongoing	We will put up the 'Speak Up' poster in our offices to raise awareness of modern slavery together with ways to raise concerns and/or seek support.
Undertake a deep dive into the cleaners engaged to clean each of our offices	Ongoing	We will continue our engagement with landlords to obtain a deeper understanding of how they manage and respond to risks. We will also seek to engage further with a cleaning contractor retained by the firm.
Analyse the results of the review of data of payments paid to suppliers as against suppliers uploaded to the ethiXbase platform to identify where there are process gaps resulting in suppliers bypassing the MSQ requirement	Completed	We will continue to perform this reconciliation process annually.
Assess the results from the MSQ responses in FY21 and FY22 to ascertain patterns, trends and changes in risk profiles	Completed	We will continue to monitor the MSQ results year on year.
Update the Human Rights Training content and review the Human Rights Policy	Completed	We will continue to monitor the currency of the Human Rights Training module and update it globally.
Seek to finalise the inclusion of human rights considerations in firm precedents	Completed	We will continue to update the boilerplate clauses as and when required to align with best practice.

## Other information

We are committed to the sharing and dissemination of our knowledge and expertise in the area of business and human rights in order to promote capacity building amongst our clients as well as more widely in the market.

We have actively engaged in the Australian Border Force Modern Slavery Consultation groups and shared the learnings with our clients on best practice compliance and reporting trends. One of our consultants, Greg Vickery AO, sits on the Expert Advisory Committee set up by the Australian Border Force in relation to the Modern Slavery Act guidance and implementation. Greg also chaired the Law Council of Australia Business and Human Rights Committee during the 2020 financial year. One of our partners, Abigail McGregor, also sits on that Committee.

## Our sustainability approach



In 2021, we launched our National Sustainability Framework with actions aligned to four United Nations Sustainability Development Goals.

**10** REDUCED INEQUALITIES



**12** RESPONSIBLE CONSUMPTION AND PRODUCTION



**13** CLIMATE ACTION



**16** PEACE, JUSTICE AND STRONG INSTITUTIONS



Through our sustainability programs of work we support target actions set for these goals by the United Nations. This includes donations of time, money and goods to aligned charities as well as changes to the way we operate, for example through programs to reduce our carbon emissions. In 2022, we made donations to the Red Cross disaster appeal to support flood victims in Australia and the humanitarian crisis in Ukraine.



Annually, Norton Rose Fulbright holds a Global Charitable Initiative (GCI) which in 2022 focused on Building Sustainable Communities. As part of a global firm, we are seeking to play our part in addressing some of the urgent challenges involved in halting climate change, which were raised in the COP26 conference in 2021. Our 2022 GCI is based around a number of actions indicated by the conference, notably accelerating action, including the need to support developing countries in adapting to the impacts of climate change and building resilience.

As part of the GCI, we have worked with the global charity [Save the Children](#) to improve living conditions for a fishing community on East Tonle Sap Lake, one of the most ecologically fragile areas of Cambodia. The East Tonle Sap Lake project is part of the GREEN Project, a four-year project part-funded by the EU. East Tonle Sap Lake has over 40,000 adults and children and 8,000 fishing households, whose livelihoods and future have been hugely impacted by climate change.

Together with Save the Children, we are working to improve their economic position and resilience to climate change, through:

- increasing access to clean water, sanitation and hygiene (known as 'WASH');
- developing green tourism as an alternative source of income to fishing; and
- improving access to education for the children of East Tonle Sap Lake.

Our global activities for the GCI will raise funds to help safeguard the future of this vulnerable community.



In the Reporting Period, we also continued to explore the changing Environmental, Social and Governance (ESG)/ sustainability landscape of which Business Human Rights forms an indivisible part. It is becoming increasingly important to view the sustainability agenda holistically and deal with all its component parts, including human rights.

## Consultation and approval

This statement was prepared by our General Counsel team and our modern slavery subject matter experts, who have consulted with partners, employees and contractors of both Norton Rose Fulbright Australia and Norton Rose Fulbright Australia Services Pty Ltd. Norton Rose Fulbright Australia's Australian Partnership Council approved this statement on behalf of the partners of Norton Rose Fulbright Australia on 25 October 2022, and the board of directors of Norton Rose Fulbright Australia Services Pty Ltd approved this statement on 21 October 2022. Annexure B sets out the page references within this statement addressing the mandatory reporting criteria.

**Alison Deitz**

**Chief Executive Partner**

(Norton Rose Fulbright Australia)

and

**Director**

(Norton Rose Fulbright Australia Services Pty Ltd)

**December 2022**

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## Annexure A

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### Existing policy or procedure

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- a) All partners and staff are expected to comply with our **Business Principles** of Quality, Unity and Integrity as well as any relevant laws and professional codes of conduct applicable to us. These ethical principles are embedded in employment contracts and supported by our policies as set out in our intranet, and are communicated to new employees on commencement.
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- b) Our **Human Rights Policy** articulates our commitment to respecting internationally recognised human rights under the UN Guiding Principles, the International Bill of Human Rights and the ILO Declaration. It also sets out our expectations for the conduct of our business partners.
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- c) We recognise that one of the fundamental human rights is the right to an adequate living wage. Norton Rose Fulbright Australia provides at least the minimum entitlements called the **National Employment Standards** to all its full-time and part-time employees. For those employed under the Legal Services Award 2020 (LSA), we ensure compliance with the minimum pay and conditions as set out in the award. We comply with the minimum wage standards applicable to each of our offices and there is a regular process in place to monitor compliance.
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- d) We have an established **remuneration framework** which is designed to ensure our people are paid fairly, competitively and based on merit. Our remuneration framework is structured to reward people for their individual and collective contribution to our success, for demonstrating our values and for creating value for the firm, our clients and stakeholders.
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- e) In our efforts to address the human rights risk of excessive working hours, our People and Development team reviews excessive hours and overtime hours and provide any necessary support to employees to manage their workload.
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- f) Freedom from discrimination based on gender, race, ethnicity, sexual orientation or any other status is set out in the Universal Declaration of Human Rights and other international human rights treaties and Declarations. We recognise that **diversity and inclusion** is a critical business issue. We aim to leverage the rich diversity of our people in order to provide better service to our clients now and into the future. We value difference and the variety of perspectives that this brings to the firm. We have a well-developed diversity and inclusion policy and program - and promote a diverse workforce and an inclusive culture.
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- g) The right to feel safe in our workplaces is another enshrined human right. We take a **Zero Tolerance** approach to sexual harassment and indeed any form of harassment, discrimination or bullying. Our policies reflect this stance and every member of our firm has the right to feel respected and safe. We refreshed and updated our equal employment opportunity (EEO), discrimination and harassment policies and launched our Appropriate Workplace Conduct Policy and Issues and Complaints Resolution Procedure policy (policy effective April 2020). This was supported by a mandatory e-learning module, Fostering a Respectful Workplace (released in July 2020 and subsequently updated), covering a variety of topics such as discrimination, harassment, bullying, sexual harassment and other inappropriate behaviour.
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**Existing policy or procedure**

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- h) Workplace health and safety has been central to our response to the continued **COVID-19** pandemic. A comprehensive risk assessment framework was developed to identify hazards and control measures for the operation of our offices. Risk issues and control measures are brought to the attention of the "Unlock" Committee (a committee comprising the Chief Executive Partner, and senior partners and managers) who lead our response to the pandemic and ensure that business processes, procedures and standards remain in place while the firm adapts to new (more agile and virtual) ways of working. Responding to the ongoing disruption due to restrictions and lockdowns, our leaders and the People and Development team actively reached out to employees to check on their wellbeing and offered varied work arrangements to support individual circumstances. Our COVID-19 response has now moved to a management and oversight one given the changes in government requirements during 2022.
  - i) A **mental health risk assessment** was also developed to identify hazards and control measures to respond to heightened stress, anxiety and other mental health challenges caused and/or exacerbated by the pandemic. Our Mental Health First Aid Officers undertook skills building in May 2021 and specialist training on the COVID-19 wellbeing journey and psychological risks in July 2020. A range of additional mental health initiatives has been offered to support employees, including wellness surveys, a dedicated wellness portal (providing mental health resources and tips) and a wellness training program.
  - j) In 2017/2018 we undertook an extensive review of our **client onboarding system** from a human rights perspective. Our client and matter induction process is extensive and it takes potential risks relating to human rights into consideration. Compliance officers, including those in our Australian Client Due Diligence (CDD) team, have been trained to extend their Know Your Client (KYC) screening to include the human rights record of, amongst other things, the client, counterparties and any relevant jurisdiction(s).
  - k) The Modern Slavery Questionnaire (**MSQ**) was developed by our Business Human Rights group in 2018 to promote more sustainable sourcing practices and to streamline the process of assessing modern slavery risk in our own supply chain. It is a cloud-based solution that brought together powerful analytics, our global human rights expertise and user-friendly design to identify and manage supply chain risk. Through the MSQ process, we allocate risk ratings to suppliers which then provide the groundwork for informing the actions to be taken. In July 2020, the MSQ was licensed to ethiXbase.
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## Annexure B

	Mandatory criteria	Page number/s
a)	Identify the reporting entity.	1
b)	Describe the reporting entity's structure, operations and supply chains.	3
c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	4-5
d)	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.	5-8
e)	Describe how the reporting entity assesses the effectiveness of these actions.	8-9
f)	Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	11