



Modern Slavery Statement 2021/2022

This Modern Slavery Statement (Statement) is given jointly by MinterEllison (ABN 91 556 716 819) and Minter Ellison Services Pty Ltd (as trustee for the Minter Ellison Services Trust) (ABN 55 971 237 295) and covers certain Australian affiliated entities and other entities we own or control and businesses we operate, including MinterEllison Consulting and IT Newcom Pty Limited. Any references to “we”, “us”, “our” or the “firm” are references to the two reporting entities and the entities they own and control.

This Statement has been prepared in accordance with the requirements in the Modern Slavery Act 2018 (Cth) (Modern Slavery Act) for the reporting period 1 July 2021 to 30 June 2022. It was approved by the MinterEllison Partnership Board on 15 December 2022 and the Minter Ellison Services Pty Ltd board on 28 November 2022.

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MinterEllison's purpose

We are an Australian based law firm and our purpose is to create lasting impacts with our clients, our people and our communities. Our values include that we build authentic and enduring relationships and we support sustainable ways of working. These values underpin our approach to recruiting and developing our people in an inclusive workplace environment which nurtures wellbeing and sustainable careers. Our ESG framework is centred on sustainability and responsible business policies which set the context for our sustainable supply chain management practices and our approach to governance across the firm centres on accountability and transparency which reflect the firm's values.

We make this Statement as a further commitment to fulfilling our purpose. Reducing the risks of modern slavery in our supply chains is one of the many ways we seek to positively impact our clients and personnel who are directly and indirectly involved in our firm. We also engage with our clients, our people and the broader community by publishing articles and conducting training to raise awareness about modern slavery and the Modern Slavery Act.

With a strong commitment to continuous improvement and to undertake the work necessary to minimise the risk of modern slavery in our operations and supply chains, we set out in this Statement our firm's current approach, and future commitments, to understanding, identifying and addressing modern slavery risks in our operations and supply chains.

Our structure and operations

MinterEllison is a partnership and is led by Chief Executive Officer and Managing Partner, Virginia Briggs and the Executive Leadership Team, with supervision from the MinterEllison Partnership Board, chaired by Andrew Rentoul.

Minter Ellison Services Pty Ltd is the trustee of a services trust which provides administrative and support services to the firm.

The MinterEllison Partnership operates a number of adjacent and complementary businesses including MinterEllison Consulting, Flex (a division of MinterEllison) and IT Newcom.

The firm primarily operates within Australia, and as at 30 September 2022, we had over 2700 staff working in Sydney, Melbourne, Brisbane, Canberra, Perth, Adelaide, Darwin, and staff in representative offices in Shanghai and Beijing.

We offer an integrated suite of legal and consulting services including:

- a full range of corporate and commercial legal services and advice to both private and Government clients across various industries;
- consulting services covering technology, tax, risk and regulatory, and infrastructure; and

- information technology consulting and advisory services.

Our team collaborates across Australia, New Zealand, Asia and the UK to deliver seamless services to our clients. We work with a network of associated entities, including MinterEllison LLP (Hong Kong), MinterEllison LLP (Ulaanbaatar), MinterEllison (London), MinterEllisonRuddWatts (New Zealand) and a legal practice operating in the Gold Coast, which are licenced to use the name MinterEllison. These associated entities are not owned or controlled by MinterEllison or Minter Ellison Services Pty Ltd.

Our supply chain

As a professional services practice, our principal activities involve the provision of legal and consulting services to our clients. We require certain goods and services to conduct our operations and deliver our services to our clients.

The majority of goods and services that we procure come from suppliers based in Australia (which is a country with a low prevalence of modern slavery according to the Walk Free Foundation's Global Slavery Index). The main categories of goods and services that we procure (directly and indirectly) are:

- **Information and communications technology (ICT):**
This includes 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.
- **Business services:**
This includes supply of our office furniture and fit outs, stationery and branded items, knowledge subscription services, document archiving and management services and courier/postal services as well as printer maintenance services and document printing services.

- **Professional services:**
Including taxation, external legal counsel, consulting and professional and personal development, and welfare training programs.
- **Office facilities management:**
The services that we use to maintain our offices, including leasing, office maintenance services, utilities, cleaning and security, and office relocation services.
- **Mobility and travel:**
This includes vehicle and airplane travel bookings and accommodation bookings.
- **Hospitality and catering:**
Including onsite and offsite catering and events.



Assessment of modern slavery risks

We recognise that modern slavery is a global problem affecting every country of the world which requires a co-ordinated response from governments and companies alike. In our approach to modern slavery, we have taken guidance from: the Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities developed by the Department for Home Affairs; the UN Guiding Principles on Business and Human Rights which sets the standard for countries and companies to prevent, address and remedy human rights abuses committed in business operations; and target 8.7 under the UN Sustainable Development Goals which sets a global goal to take action to eradicate forced labour and end modern slavery.

We understand that modern slavery is an umbrella term that includes a range of serious exploitative practices and labour rights abuses, such as human trafficking, debt bondage, forced labour and the worst forms of child labour. While poor labour practices such as substandard working conditions or underpayment of workers do not meet the definition of modern slavery, we understand these forms of exploitation are high risk factors that may lead to modern slavery over time. Modern slavery can also occur in any industry, at any point in the supply chain, but is often hidden deep down the supply chain and so can be difficult to detect. High risk industries identified by the Human Rights Working Group of the Responsible Investment Association of Australasia include agriculture and fishing, apparel, construction and building materials, electronics and electronics recycling and mining. We recognise that red flags that might identify modern slavery include complex and long supply chains with many intermediaries, supply chains with predominately migrant workers and oligopolistic industries with a small number of companies putting pricing pressures on their suppliers.



Approach to risk assessment

Our dedicated Working Group was established in FY19/20, comprised of partners and representatives from our legal, risk and business operations, including procurement and information technology teams (Working Group). During FY21/22, the Working Group examined the learnings from the previous year and made improvements to further develop the firm's risk assessment approach (as discussed further below in the 'Assessing the effectiveness of our actions' section), our processes and ongoing monitoring, and reporting with respect to modern slavery.

As part of these improvements, we undertook further risk assessment of a previously identified risk area, being our ICT suppliers, and performed a review of our premises cleaning providers, which is another identified risk area, as detailed further below. On the basis of the outcomes of our risk assessments during the reporting period, we consider that the risk of modern slavery within the firm's operations and supply chain is low.



ICT suppliers

We have previously identified that the ICT sector poses some level of risk of forced labour in certain regions and there is generally a lack of public information on ICT supply chain management, including with respect to the materials and components in

ICT hardware. Therefore, there continues to be an inherent risk that our procurement of ICT hardware is linked to modern slavery practices, most prevalent in the raw material extraction, manufacturing and disposal stages.

To date, approximately 75 of our material ICT suppliers, including software providers, have completed our online Modern Slavery Risk Assessment Questionnaire (Questionnaire) including 30 during FY21/22. A number of our ICT suppliers are headquartered in or have engaged subcontractors (for example a global support model that included post-sale services) located in countries with a higher prevalence of modern slavery according to the Walk Free Foundation's Global Slavery Index, such as India and the Philippines. However the application of our risk assessment methodology to the Questionnaire responses from our ICT suppliers did not produce any high risk ratings.

With respect to ICT suppliers, our assessment is that our overall risk of causing or contributing to modern slavery through our operations and procurement of goods and services is low. However we recognise that the risk of being directly linked to modern slavery is higher because of the presence of a small number of our ICT suppliers in geographies associated with a higher prevalence of modern slavery.

Case Study: ICT Supplier

In FY20/21 we had identified that a global IT software supplier which provided inadequate and inconsistent responses to our Questionnaire was headquartered in India employing thousands of staff.

In FY21/22, the IT team arranged meetings with the supplier to communicate our concerns and obtained updated information about the supplier's operations and its processes. We carried out a further risk assessment based on

the additional information provided by the supplier, including the supplier's commitment to preparing a modern slavery report. Both parties benefited from the open discussions and the IT team was committed to following the supplier's progress going forward. Given that the risk rating remained at medium, the decision was made to renew the licence on an annual basis with a view to assessing the risk rating each year.

Assessment of modern slavery risks

Other suppliers of services / third party arrangements

During FY21/22 we performed a risk based analysis of our non-ICT suppliers against a range of modern slavery risk indicators. We continued to use our online Questionnaire to engage with non-ICT suppliers, including suppliers which take part in our competitive tender process. Competitive tenders included procurement of insurance related services, professional services and ICT hardware/software.

In situations where a supplier declined to complete our online Questionnaire, we undertook our own desktop review based on the information provided by the supplier (including their own modern slavery statement and standard policies available from their website) and our own information sources. Our data capture and reporting processes have been enhanced to capture these situations for ongoing monitoring purposes.

Some smaller suppliers who are not required to comply with the Modern Slavery Act did not feel they needed to complete the Questionnaire. Some smaller suppliers were answering modern slavery questions for the first time. In those situations, the procurement team offered to support them if they had questions while completing the Questionnaire. To help small suppliers who lack resources to understand modern slavery risks, the procurement team is looking to develop a tool such as an easy to understand information sheet (as noted in the 'future actions' section below).

Another potential modern slavery risk we have identified through our risk assessment process is in sectors where a large portion of people are paid the minimum wage or are migrant workers. These sectors include accommodation services, office premises cleaning services and hospitality and catering services.

We continued to focus on understanding any risks that may be present in cleaning services we obtain directly or arranged through facilities services provided by our office landlords. We recognise cleaning services may be at higher risk with the potential for low skilled and migrant workforce presenting opportunities for exploitation and layers of subcontracting which obscure labour conditions. These types of services are often indirectly procured by the firm through outsourcing and third party contracting arrangements.

Following additional due diligence work on our supply chain, we identified no additional factors which indicate that the risk profile for our operations or our suppliers has changed from our previous reporting period, supporting our assessment that our overall risk of causing, contributing or being directly linked to modern slavery through our operations and procurement of goods and services is low.



Assessment of modern slavery risks



Case Study: Cleaning Services Report

In FY21/22 we undertook an investigation into contracted cleaning services in all our Australian office premises to better understand the risks that may be present and to better understand initiatives that were being undertaken in the commercial property sector regarding cleaning services and modern slavery risks. In particular, we examined the work of the Cleaning Accountability Framework (CAF) (an independent, not-for-profit multi-stakeholder initiative that seeks to improve labour standards in the cleaning industry in Australia), the Property Council of Australia and the use of expert external consultants by some landlords and property owners.

The investigation included an examination of our 'Base Building Cleaning Services', where cleaning services were provided to us by subcontractor arrangements arranged by the landlord (ie tier 2 supplier) or sub-contracted by the landlord's asset manager (ie tier 3 supplier). The purpose of the investigation was to better understand the risks associated with the tier 2 and tier 3 suppliers. We were able to contact the tier 2 and tier 3 suppliers via our landlords who were supportive of our examination.

The examination included two parts:

- assessment of the cleaning service provider (tier 3). We did this by using our standard assessment methodology on the tier 3 supplier itself including having the cleaning service provider complete our Questionnaire. The

purpose was to look directly through the supply chain and engage directly with the actual supplier of the service; and

- an interview with each office landlord to understand their current position and understanding of modern slavery risk in the cleaning services sector and ascertain their future direction regarding the contracting of cleaning services, in particular to establish whether they were moving towards detailed compliance frameworks that can deliver effective assurances on modern slavery risk.

Through this process we discovered that:

- all our subcontracted cleaning service providers were large sophisticated entities who either were themselves subject to modern slavery reporting obligations and/or had involvement with the CAF initiative. Using our Modern Slavery Risk Assessment Matrix, publicly available information and the Questionnaire, each provider was eventually risk rated in the low category; and
- the level of maturity and understanding of the risks of modern slavery in contracted cleaning services varied across landlords, for example:
 - for three of our offices, the landlord had a very mature approach to the modern slavery risks associated with cleaning services with

detailed compliance framework and independent assurance (including either CAF certification or independent auditing of providers). This provided us with a high level of confidence; and

- for the other offices, the position is either a rather less mature approach on the modern slavery risks associated with cleaning services or in a state of flux (for example, because it is a new building or anew landlord) and this provided us a lower level of confidence. In these offices it is the sophistication of the supplier itself who provided us with assurance rather than the landlord.

As a result of this investigation in FY22/23 we will be:

- updating our office procurement strategy to include minimum standards around cleaning contracts in particular compliance frameworks that can deliver effective assurances on modern slavery risks; and
- providing training to key corporate services staff in each office to understand the risks and visible indicators around modern slavery for cleaning contractors.

In addition, in FY23/24 we plan to repeat our engagement with the landlords on this issue.

Assessment of modern slavery risks



MinterEllison policies

Our assessment of the risk of modern slavery in our operations and supply chains has been carried out against the background of our existing policies and procedures aimed at ensuring a safe and just working environment for our staff and our suppliers. These policies, which are reviewed and updated on a periodic basis in order to improve our practices, include:

- **Anti-Bribery and Anti-Corruption:** Consistent with our culture of trust, integrity and fairness, this policy outlines a zero tolerance for bribery and corruption.
- **Workplace Behaviour including Discrimination, Harassment, Sexual Harassment and Bullying:** This policy applies to all our operations and covers our policies and procedures relating to workplace behaviour, discrimination, harassment, sexual harassment and bullying.
- **Code of Conduct:** This sets out how all members of our practice must conduct themselves to uphold our values and deliver on our purpose to create lasting impacts with our clients, our people and our communities.
- **Diversity and Inclusion:** This policy aims at leveraging our diversity through a culture of inclusion and collaboration to promote our values in the workplace.
- **Work Health, Safety and Wellbeing:** This policy outlines our commitment to building a safe workplace and summarises the important rights and obligations in relevant work health and safety legislation.
- **Responsible Procurement Policy:** This policy applies to the purchase of goods and services by the firm and seeks to ensure that the goods and services we purchase are consistent with, or at a minimum, reflect the ethical commitment set out in the principles of the UN Global Compact.
- **Procurement Compliance Standards:** These standards complement our Responsible Procurement Policy and sets out our minimum expectation of our suppliers. The Standards include amongst others ethical business practice, workplace health & safety, modern slavery, diversity and inclusion and sustainability.
- **Whistleblower Policy:** This policy sets out the procedures and reporting channels available to our staff to report unethical or illegal conduct relating to the firm's operations. The policy also explains the whistleblower protections available and how reports may be made anonymously (if preferred). This policy was approved by the Board during the reporting period (in April 2022) and is a key policy supporting the firm's SpeakUp program available to all staff.



Summary of actions to assess and address modern slavery risks

During FY21/22, we carried out all of the future actions proposed in our FY20/21 Statement as detailed above in the 'Assessment of modern slavery risks' section and summarised in the table below:

Proposed action	FY21/22 actions
<p>To take a risk based approach in our engagement with suppliers by applying the Questionnaire on selected categories of suppliers</p>	<p>A risk based approach was defined and implemented, whereby we conducted a modern slavery assessment depending on the procurement category and location of the goods or services being provided. These assessments took into account the supplier and their subcontractors (ie our indirect supply chain).</p> <p>We also conducted a modern slavery risk assessment as part of our tender process for insurance, professional services and ICT categories.</p> <p>Where possible, we have included modern slavery and compliance with our Procurement Compliance Standards in our supplier agreements.</p>
<p>To identify and implement improvements in our procurement arrangements to address modern slavery risks</p>	<p>As part of the firm's procurement process improvements, we have made business operations managers (who manage the majority of supplier relationships) aware of the identified modern slavery risks and the firm's processes and steps being taken to mitigate these risks prior to onboarding suppliers. During FY21/22 presentation sessions were given to managers in the Corporate Services, Talent, and Digital teams.</p> <p>We also established a procurement page on the firm's intranet, including a link to further information and resources relating to modern slavery.</p>
<p>To increase utilisation of modern slavery risk mitigation tools developed by the Working Group</p>	<p>We have continued to make improvements to our modern slavery risk mitigation tools and find ways to integrate them into the firm's procurement framework.</p> <p>The system improvements and integration resulted in increased awareness within the business and increased volume of assessments completed.</p> <p>The procurement team are more confident and efficient in undertaking risk assessments and engaging with suppliers on areas of concern.</p>
<p>To develop and implement a remediation plan to address any findings of modern slavery practices in our supply chain</p>	<p>We have developed a remediation plan for use by the procurement and risk teams to ensure modern slavery findings or concerns are addressed promptly. The remediation plan sets out internal escalation points and consultation processes to ensure appropriate remediation actions are taken.</p>

Assessing the effectiveness of our actions

Our actions to assess and address modern slavery risks were overseen by the Working Group which met quarterly to:

- review our modern slavery risk assessment methodology;
- monitor progress against the program of actions planned for the reporting period;
- approve and monitor implementation of new and updated internal resources concerning modern slavery; and
- share insights and new developments in modern slavery reporting under the Modern Slavery Act.

Quarterly updates were provided to the MinterEllison Partnership Board on the progress of MinterEllison's processes and actions for identifying and addressing modern slavery risks.

The actions the Working Group undertook during FY21/22 contributed to the following improvements in our engagement with our suppliers and the ways in which we assess and address modern slavery risks:

- continued to refine our risk based approach for assessing and addressing modern slavery risk, including (where applicable) to assess the subcontractors involved in the provision of services to the firm;
- focused on in-depth engagement with the suppliers in the tender process, prior to onboarding or on contract renewal;

- identified opportunities to better understand sector specific risks and tier 2 and tier 3 suppliers, for example through the examination of cleaning service providers;
- further developed understanding of our suppliers, their operations and supply chain, by close engagement to resolve concerns about the supplier's operations or supply chain from their responses in the Questionnaires;
- increased formalisation and centralisation of the firm's procurement process, record keeping and management of suppliers; and
- defined internal escalation processes to ensure identified risks and concerns are brought to the attention of senior personnel and the product/purchase sponsor, and a response plan is followed.



Consultation

The Statement was prepared by the Working Group comprised of representatives of partners who are leading our firm's modern slavery risk management practice, procurement teams and General Counsel and Risk teams. The Working Group prepared and implemented a project plan which was endorsed by the firm's Executive Leadership Team to prepare this Statement. Members of the Working Group engaged with business units across the firm, including Finance and client practice groups, to understand the firm's supply chain. The Working Group worked collaboratively to develop and implement the modern slavery project plan and to prepare this Statement.

MinterEllison consulted with its owned and controlled entities in the development of this Statement. The Working Group referred the Statement to MinterEllison Consulting and IT Newcom Pty Limited for feedback, which led to an open discussion on the reporting requirements and the future actions of continuous improvement.

The Statement was reviewed by the Executive Leadership Team, prior to formal approval by the MinterEllison Partnership Board and Minter Ellison Services Pty Ltd.

Other information – future actions

With our focus on continuous improvement and building on the knowledge gained from our due diligence and risk assessment, our plan is to take the following actions during our subsequent reporting periods to reduce the risk of modern slavery in our supply chains:

- monitor the federal government's review of the Modern Slavery Act and review the firm's policy and processes on modern slavery taking into account the outcome of the review;
- review premises procurement practices and continue engagement with landlords and service providers in relation to modern slavery risks;
- conduct additional firm-wide training to increase awareness of modern slavery risks;
- develop tools to assist smaller suppliers who lack resources to understand modern slavery risks, including by providing digestible information sheets;
- improve our supplier data capture processes for our procurement activities within the firm in order to further improve our operations and supply chain risk assessment processes, including consideration of how we can improve our Questionnaire;
- continue to require our suppliers to adhere to our Responsible Procurement Standards;
- continue our risk assessment of suppliers to better identify risk and strengthening our supplier engagement around modern slavery
- continue to identify ways to raise awareness of our grievance mechanisms with potentially affected stakeholders; and
- continue to engage and collaborate with relevant external stakeholders to share good practice.

Statement approval

This Statement was approved by the boards of each of the two reporting entities covered by this Statement.

This Statement was approved by the MinterEllison Partnership Board in its capacity as the principal governing body of MinterEllison on 15 December 2022. This Statement is signed by Andrew Rentoul in his role as Chairman of the MinterEllison Partnership Board and Virginia Briggs in her role as Chief Executive Officer and Managing Partner on 15 December 2022.

Signed by:



Andrew Rentoul

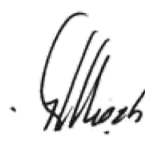
Chairman of the Partnership Board of MinterEllison



Virginia Briggs

Chief Executive Officer and Managing Partner of MinterEllison

This Statement was approved by the board of Minter Ellison Services Pty Ltd in its capacity as the principal governing body of Minter Ellison Services Pty Ltd on 28 November 2022. This Statement is signed by Peter Coats in his role as director of Minter Ellison Services Pty Ltd on 28 November 2022.



Peter Coats

Chairman of the Board of MinterEllison Services Pty Ltd

Mandatory Criteria

This Statement addresses the mandatory criteria for a modern slavery statement outlined in section 16 of the Modern Slavery Act. The below table indicates where each requirement is addressed in this Statement.

Criteria	Page Number
(a) Identify the reporting entity.	1
(b) Describe the structure, operations and supply chains of the reporting entity.	3-4
(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.	5-8
(d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	5-9
(e) Describe how the reporting entity assesses the effectiveness of such actions.	10
(f) Describe the process of consultation on the development of the statement with any entities that the reporting entity owns or controls (if a joint statement has been made under section 14, also describe the process of consultation with the entity giving the statement).	11
(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	11