

Modern Slavery Statement
*for the financial year ending
30 June 2020*

1. Introduction

This Statement is made by Slater & Gordon Ltd (ABN 93 097 297 400) and each of its wholly owned operating subsidiaries (together **Slater and Gordon**) under the Modern Slavery Act 2018 (Cth) (**Act**) for the financial year ending 30 June 2020 (**FY2020**).

This is Slater and Gordon's first Statement under the Act. The Statement details the steps Slater and Gordon has taken to assess modern slavery risks within its business and supply chains and the specific actions implemented in FY2020 to help minimise those risks.

Slater and Gordon is committed to combatting modern slavery in its supply chain, and to continuously improve strategies to identify and mitigate modern slavery and ethical sourcing risks.

2. Our structure, operations and supply chain

Founded in 1935, Slater and Gordon is a leading consumer law firm providing specialist legal and complementary services in a broad range of areas, including:

- Personal Injury
- Superannuation and Insurance
- Class Actions
- Commercial Litigation
- Employment Law

Serving over 50 locations in Australia, the operations of Slater and Gordon are conducted primarily by Slater & Gordon Ltd (ACN 097 297 400), a public company listed on the Australian Stock Exchange. In addition, Slater and Gordon operates its business through the following entities, all of which are wholly owned subsidiaries:

- Slater & Gordon Lawyers (NSW) Pty Ltd (ACN 119 864 881)
- SG NSW Pty Ltd (ACN 161 483 414)
- All States Legal Co Pty Ltd (ACN 125 001 818)
- Slater and Gordon (TML) Queensland Pty Ltd (ACN 128 949 753)
- Schultz Toomey O'Brien Lawyers Pty Ltd (ACN 136 676 714)
- Conveyancing Works (Qld) Pty Ltd (ACN 127 912 074)

Our supply chain predominantly consists of goods and services acquired to assist our people to deliver legal services. By spend, our largest suppliers are our financiers, litigation funders and other professional service providers: in this regard we work in conjunction with barristers, other law firms, legal, medical and other subject matter experts who are engaged on behalf of our clients to assist with the progression of our clients' legal matters.

In addition, our supply chain includes the physical premises we occupy, facilities we use (photocopiers, office supplies, etc), maintenance contracts, software licences and IT infrastructure.

3. Our position on Modern Slavery

Slater and Gordon is committed to safe workplaces and to limiting the risk of modern slavery within its own business and supply chains.

Slater and Gordon adopted an Ethical Sourcing and Modern Slavery Policy on 25 June 2020. The policy is designed to ensure that the company sources products and services in accordance with its legal obligations and in line with community expectations and its own values, while working with suppliers to prevent, mitigate and where appropriate, remedy modern slavery practices in their operations and supply chains.

4. Risks within our operations and supply chain

As a professional services business whose workforce is employed solely in Australia, there is negligible risk of modern slavery within our direct business operations.

Further, as our supply chain consists largely of the supply of goods and services which support the delivery of professional services, we consider there is minimal risk to our firm being directly linked to modern slavery practices through our supplier contractual relationships.

Nonetheless, we have developed risk management processes and undertaken an initial risk assessment to identify those aspects of our supply chain that might be more vulnerable to modern slavery risk thereby indirectly exposing Slater and Gordon to modern slavery practices.

5. Actions taken in FY2020

In FY2020 we undertook the following actions:

5.1 Establishment of Modern Slavery working group

Our first step was to convene a working group from key areas of the business including Legal, Risk, Finance, Facilities and IT. Members of the working group underwent training to understand which supply chains were most vulnerable and ways supply chains could potentially be compromised.

5.2 Analysis of supply chain

The working group developed initial risk management processes to identify, assess, mitigate and monitor potential high-risk areas where Slater and Gordon could potentially cause, contribute to, or be directly linked to modern slavery practices.

Modern slavery risk rating criteria were developed, based on the Department of Home Affairs' guidance and the working group reviewed modern slavery risk indicators and risk rating criteria to identify where high modern slavery risks were at least possible focussing on suppliers where we had a higher value of cash spend as well as industry sectors deemed to have a higher vulnerability to modern slavery.

It was identified that the most vulnerable sectors within our supply chain were likely to be:

- Cleaning and Security Contracts, due to the use of unskilled manual labour.
- Technology Purchase Contracts, which were likely to source parts from countries where modern slavery is endemic.

5.3 Additional due diligence process

We undertook a process of targeted due diligence in relation to suppliers operating in the higher risk industry sectors identified above.

The purpose of the due diligence was to gather, document and review the following data:

- Brief description of types of goods or services purchased
- Country of origin of Supplier
- Office location
- Supplier Ownership Details

- Nature of Contract in Place
- Estimated size of Supplier
- Modern Slavery Statement is expected to be provided "Y/N"
- Due diligence/governance checks undertaken by Supplier to date
- Modern Slavery risks indicators present

In FY2020, almost all cleaning/security services were provided via landlords or building managers. Enquiries were made of a combined total of 34 landlords/building managers to ascertain the ways in which they were acting to address modern slavery in their supply chains.

As at the end of FY2020 we had received responses from 7 landlords/building managers, primarily from those who were members of a corporate group that was itself subject to the Act or corresponding legislation in non-Australian jurisdictions.

Similarly, enquiries were made of 17 Technology suppliers. As at the end of FY2020 we had received responses from 7 of those from who we had requested data.

We are continuing to chase responses to our due diligence enquiries as at the date of this Statement.

5.4 Adoption of Ethical Sourcing and Modern Slavery Policy

Slater and Gordon adopted an Ethical Sourcing and Modern Slavery Policy on 25 June 2020. The policy is designed to ensure that the company sources products and services in accordance with its legal obligations and in line with community expectations and its own values, while working with suppliers to prevent, mitigate and where appropriate, remedy modern slavery practices in their operations and supply chains

5.5 Template Modern Slavery clause for new supplier contracts

Slater and Gordon developed a template Modern Slavery clause for insertion in all new supplier contracts with effect from March 2020. The template requires compliance with the Act and Slater and Gordon's Ethical Sourcing and Modern Slavery Policy. It includes rights of audit and the ability to terminate in the event of non-compliance.

All supplier contracts entered into since that date have included a version of that template. The contractual terms vary in each instance depending on whether the supplier is itself bound by the Act.

5.6 Modern slavery awareness training

Slater and Gordon issued a communication to all of its staff on 12 June 2020 to launch awareness of the plight of modern slavery. The date of the launch was designed to coincide with the World Day Against Child Labour.

Shortly following the launch, all staff were required to complete compulsory training "Modern Slavery 1.0". This took the form of an online training course.

By the end of FY2020, 40% of staff had completed the compulsory training, with in excess of 99% of staff having completed the course as at the date of this Statement.

6. Assessing our effectiveness in combatting Modern Slavery in FY2020

During FY2020 we established a working group that regularly met to review our progress in combatting modern slavery in our supply chain and the effectiveness of the actions taken to

date. Going forward it is expected that the working group will meet at least bi-annually to review progress and effectiveness against our goals.

Our progress against our goals for FY2020 are set out below:

Goal	Action	Effectiveness
Improving our understanding of the modern slavery risks in our supply chains	Undertaking an analysis of our supply chain to identify areas vulnerable to modern slavery	Key risk areas (cleaners and technology supply contracts) identified and targeted for immediate attention
Raising awareness of modern slavery in the business	<p>Adopting an Ethical Sourcing and Modern Slavery Policy and requiring staff to review and be familiar with it.</p> <p>Compulsory training module for all staff</p>	<p>Adopted Modern Slavery Policy on 25 June 2020. Staff were assigned requirement to review and be familiar with the Policy in the subsequent financial year.</p> <p>40% of staff had completed training module before the end of FY2020 (99% completion rate achieved in subsequent financial year.</p>
<p>Commence engagement with our suppliers</p> <p>Commence engagement with our suppliers (cont)</p>	<p>Undertaking targeted due diligence in relation to suppliers in highest risk category</p> <p>As of March 2020, all new suppliers are contractually required to commit to combatting modern slavery in their own operations and supply chains</p>	<p>As at the end of FY2020 we had received:</p> <ul style="list-style-type: none"> • 7 responses from a cohort of 34 cleaning/security suppliers; and • 7 responses from a cohort of 17 technology suppliers <p>All new supplier contracts include appropriate modern slavery clauses</p>

7. Approval

The Board of Slater & Gordon Ltd has authorised and approved the publication of this Statement.

Slater and Gordon is pleased to publish this FY2020 Modern Slavery Statement and commits to continuing to track and publicly report on our progress in combatting all forms of modern slavery in our supply chain.

A handwritten signature in black ink, appearing to read 'John Somerville', written in a cursive style.

John Somerville
Chief Executive Officer
Slater & Gordon Ltd

11 March 2021



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