

Modern Slavery Statement

HWL Ebsworth Lawyers

Year ended 30 June 2020

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Modern Slavery Statement

1. Introduction

This statement (**Statement**) is a statement made pursuant to the *Modern Slavery Act 2018* (Cth) on behalf of HWL Ebsworth Lawyers (ABN 37 246 549 189) (**HWLE**).

This Statement relates to the reporting period commencing 1 July 2019 and ending 30 June 2020 (**Reporting Period**) and sets out the actions taken by HWLE to address modern slavery risks within its supply chain.

2. Business Overview

2.1 Background

HWLE is Australia's largest legal partnership with origins dating back to the 1890s. It is a firm which operates in 9 locations across every state and territory in Australia.

As at 30 November 2020, HWLE consisted of 180 capital partners, 85 fixed draw partners, and employed another 802 legal staff and 340 support staff.

2.2 Operations

HWLE operates within the Australian legal system and predominantly provides legal services and advice to its diverse client base which includes, but is not limited to, government department and agencies, corporate clients across numerous industries, including finance, insurance, construction, resources and property and high net worth individuals.

HWLE provides a full service, multi-faceted offering across all major areas of commercial law, including Corporate & Commercial, Litigation, Insurance, Property, Construction & Infrastructure, Banking & Finance, Workplace Relations & Safety, Australian Government and other industry-based practice groups, including Transport, Planning & Environment and Health.

HWLE's annual revenue for the Reporting Period was over \$350 million.

2.3 Supply Chain

As HWLE is an Australian-based services business, its supply chain does not include any product manufacturers, but rather is a simple supply chain consisting of suppliers that provide various goods and services to support HWLE's general operations and to provide support for its technology, systems and infrastructure.

Accordingly, HWLE's supply chain consists of information technology (IT) service providers, suppliers of IT equipment, hardware and software, insurance providers, external consultants, external legal counsel, banks and other financiers, knowledge subscription and media providers, document storage providers, postal and courier services, cleaning contractors, facility managers, travel and accommodation providers, recruitment agencies, hospitality providers, property agents, office supplies and kitchen supplies.

During the Reporting Period, HWLE's contracted suppliers were based in Australia, New Zealand, Great Britain and the United States of America.

Given HWLE's desire to maintain a disciplined and effective operating model and financial model, its relationships with its key suppliers are typically structured as stable, long-term relationships, rather than short-term arrangements.

HWLE's supply chain also consists of a broad range of indirect suppliers that provide goods and services to the suppliers that directly service HWLE. By way of example, these can include the suppliers of photocopiers that HWLE leases, office equipment to HWLE's insurance providers and external consultants, the cleaning equipment providers that provide such equipment to HWLE's cleaning contractors or the manufacturers of IT equipment that provide goods to HWLE's IT product and service providers.

3. Risk Profile

HWLE has undertaken a detailed assessment of its exposure to modern slavery risks. This included a fundamental review of HWLE's employment and staff management processes and a review of its business partners and suppliers.

Based on its most recent assessment of its exposure to modern slavery risks, HWLE considers the risk of modern slavery within its operations to be low for the following key reasons:

- (a) the nature of operations of HWLE primarily involves the provision of legal services and advice to clients in Australia, which are services that carry a low risk of exposure to modern slavery practices;
- (b) the primary location of the operations of HWLE is Australia, and all direct suppliers of goods and services are located in countries that are rated low for modern slavery practices in accordance with the Global Slavery Index;
- (c) the employees of HWLE consist only of skilled professionals, and not from groups of people where modern slavery is a key risk; and
- (d) we have undertaken a comprehensive review of our employment arrangements to ensure that we are in compliance with all legislative and award based requirements.

Nevertheless, HWLE recognises that its supply chain may indirectly be exposed to modern slavery risks.

4. Due Diligence Actions

HWLE adopts a number of due diligence processes and procedures to assess and address any potential risks of modern slavery within its supply chain. These processes are detailed below.

4.1 Responsible Procurement Policy

HWLE has adopted a Responsible Procurement Policy which sets out its objective to engage suppliers that share HWLE's approach to ethics, diversity and sustainability.

The Responsible Procurement Policy provides that HWLE expects its suppliers to comply with requirements including:

- (a) respecting fundamental human rights, including worker representation;
- (b) adopting ethical business practices with respect to the business behaviour of individuals and the organisation as a whole;
- (c) having a positive impact on the communities in which they operate;
- (d) maintaining and evidencing responsible health and safety practices; and
- (e) committing to a comprehensive policy of equal opportunities in employment.

The Responsible Procurement Policy also states that HWLE expects its suppliers to maintain management systems and practices that ensure the prevention of modern slavery, fraud, bribery and corruption.

4.2 Code of Conduct

HWLE's Code of Conduct provides a framework for decisions and actions in relation to conduct, and sets out the standards of behaviour for HWLE's employees and contractors. The Code of Conduct requires all staff members to engage in ethical, responsible and law-abiding behaviour when performing their duties.

4.3 Staff training

HWLE has recently implemented new policies that require all new employees to undertake training in relation to the firm's policy on modern slavery at the time of employment, and all staff will be required to attend refresher sessions on a bi-annual basis.

4.4 Remuneration arrangements and advice

The remuneration arrangements of HWLE relate to places of employment within Australia and are based on a combination of award and contractual employment arrangements. HWLE monitors its obligations under the *Legal Services Award 2020* continually and obtains industry specific remuneration information to ensure that it pays its employees at or above industry levels. HWLE also ensures that it complies with all

relevant legislative requirements in relation to salary, superannuation contributions and leave.

More broadly, HWLE operates a significant and national team of Workplace Relations & Safety specialists who routinely advise the business itself on the rights of its employees.

5. Remediation Actions

HWLE expects complete compliance with its Responsible Procurement Policy, Code of Conduct and all other firm policies by all staff and suppliers.

If a supplier was to be found to be the subject of a risk of modern slavery, HWLE will immediately address the risk with the relevant supplier. If the supplier was not able to demonstrate that the risk has been addressed within a reasonable period of time, HWLE will seek to discontinue its relationship with that supplier immediately.

6. Measuring Effectiveness of Actions

HWLE has not been required to assess its effectiveness in addressing modern slavery practices as no major modern slavery risks have materialised to date.

Nevertheless, HWLE may consider to review the effectiveness of the measures in place that are designed to combat modern slavery risks by undertaking activities such as:

- (a) setting up an annual review process, whereby HWLE's senior management team reviews the firm's response to modern slavery and actions taken;
- (b) regularly reviewing assessment processes to ensure that any new risks are identified if HWLE chooses to expand operations into new regions or countries; and
- (c) conducting internal audits of suppliers to determine if mitigation measures have been consistently adopted by such suppliers.

7. Approval

This statement was approved by Juan Jose Martinez in his capacity as Managing Partner of HWL Ebsworth Lawyers (ABN 37 246 549 189) pursuant to the powers delegated to him by the partnership under the HWL Ebsworth Partnership Deed.

Signed:



Name: Juan Jose Martinez
Title: Managing Partner