
JOHNSON
WINTER
SLATTERY

Modern Slavery Statement

November 2024



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Johnson Winter Slattery pays respect to Elders past and present of our nation’s Aboriginal and Torres Strait Islander communities. We honour the deep spiritual, cultural and customary connections of Traditional Owners to the Australian landscape, including Australia’s waterways, land, and sea country.

This statement is made and published on behalf of Johnson Winter Slattery (ABN 70 843 523 318) in compliance with the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). This is Johnson Winter Slattery’s third modern slavery statement, which has been prepared in accordance with the Modern Slavery Act for the reporting period FY2023 – 2024 (**reporting period**). Johnson Winter Slattery is a partnership operating in Australia with its registered address at Level 8, 211 Victoria Square Adelaide SA 5000. Johnson Winter Slattery does not own or control any other entities. Johnson Winter Slattery has an associated services entity providing administrative and support services to the partnership: JWS Services Pty Ltd in its capacity as trustee of the JWS Services Trust (**services entity**). Johnson Winter Slattery and the services entity are under common control. References to “Johnson Winter Slattery”, “we”, “us”, “our” or the “firm” are to Johnson Winter Slattery (ABN 70 843 523 318).

About us

Johnson Winter Slattery is a leading independent full service commercial law firm with specialist expertise in all facets of commercial activity, covering the spectrum of transactional needs, advisory and compliance as well as dispute resolution.

OUR OPERATIONS

We are engaged by publicly listed corporations, major privately held businesses, investment funds, not for profits, industry bodies, government agencies and regulators as legal counsel on important transactions and disputes throughout Australia and in respect to Australian law on transactions and disputes outside of Australia.

We help our clients navigate legal complexity in both commercial transactions and dispute resolution by applying specialist legal expertise, innovative technology and commercial awareness to our clients' business objectives. Commitments to outstanding client service, a collaborative ethos and the importance of fashioning commercial outcomes are hallmarks of our firm.

We also act as Australian counsel to foreign businesses and law firms. We appreciate the particular needs of those investing in Australia and their advisors. We assist clients and their primary counsel in navigating Australian regulatory requirements concerning inbound and outbound capital flows.

We currently have over 80 partners, supported by more than 350 lawyers, business development, finance, HR and IT professionals from our offices located in Melbourne, Sydney, Brisbane, Adelaide, Canberra and Perth.

OUR SUPPLY CHAIN

Our supply chain consists of goods and services that support the provision of professional services to our clients. Key categories of goods and services we procure include offices and office services, information and communications technology (including hardware, software, cybersecurity and support services), branded merchandise, hospitality and catering, accommodation and event services, professional and consulting services, and recruitment. The services entity procures a lot of the goods and services on behalf of the firm.

Our tier 1 suppliers to the services entity remain predominantly based in Australia however some of our tier 1 suppliers to the services entity source goods and services from outside Australia.

Our Approach to Modern Slavery

We seek advice from the firm's modern slavery experts to actively identify modern slavery risks in our own operations and in the operations of our suppliers. The firm's modern slavery experts also assist clients on a variety of modern slavery issues including advising on how to identify, prevent and mitigate adverse human rights impacts in their businesses and supply chains.

Our governance, enacted through policies and procedures, along with our collaboration with suppliers and clients seeks to prevent or mitigate adverse human rights impacts in Australia and overseas. We take a collaborative approach to influence change in our supply chains and with our business partners.

WITHIN OUR OPERATIONS

In respect of the reporting period, our operations vulnerability to modern slavery remains low. In coming to this conclusion we have considered the following:

- we are a law practice who provide professional services to our clients in a regulated industry where legal practitioners and law practices are required to conduct themselves in accordance with professional obligations and standards;
- we rely on a highly skilled professional workforce to provide professional services to our corporate clients and do not rely on migrant skilled or unskilled workers or a transient/gig workforce;
- we regularly review our recruitment practices and have a centralised recruitment function with direct and active oversight of recruitment at the executive level;
- we do not have operations outside of Australia and we note in this regard that Australia is among the least vulnerable countries to modern slavery in the Asia Pacific region and globally.

While we do on occasion employ holders of working holiday visas and other skilled visa holders, these workers are employed on the same terms as Australian citizens and permanent residents.

We have a zero tolerance approach to modern slavery, discriminatory conduct or practices which are adverse to human rights. This approach underpins the governance of our firm and its operations, implemented through our policies, including:

Procurement Policy: A policy that affirms the firm's commitment to a responsible and ethical procurement process. The policy requires procurement staff to adhere to ethical and professional standards of behaviour, and mandates the consideration of sustainability, ethics and social responsibility in respect of each procurement. The policy also specifically introduces procedures designed to assist in the assessment, management and prevention of modern slavery risks in our supply chains, which procedures have been updated during the reporting period.

Third Party Supplier Security Policy: A policy designed to ensure third-party suppliers to the firm and their subcontractors meet certain minimum requirements, including by reference to the Procurement Policy in relation to modern slavery and other ethical concerns.

Workplace Behaviour Policy: A policy that confirms the commitment of the firm to provide a safe and respectful work environment for all our people, sets out the expectations the firm has of each partner and employee, and provides guidance on and a framework for reporting, handling and investigating workplace behaviour complaints.

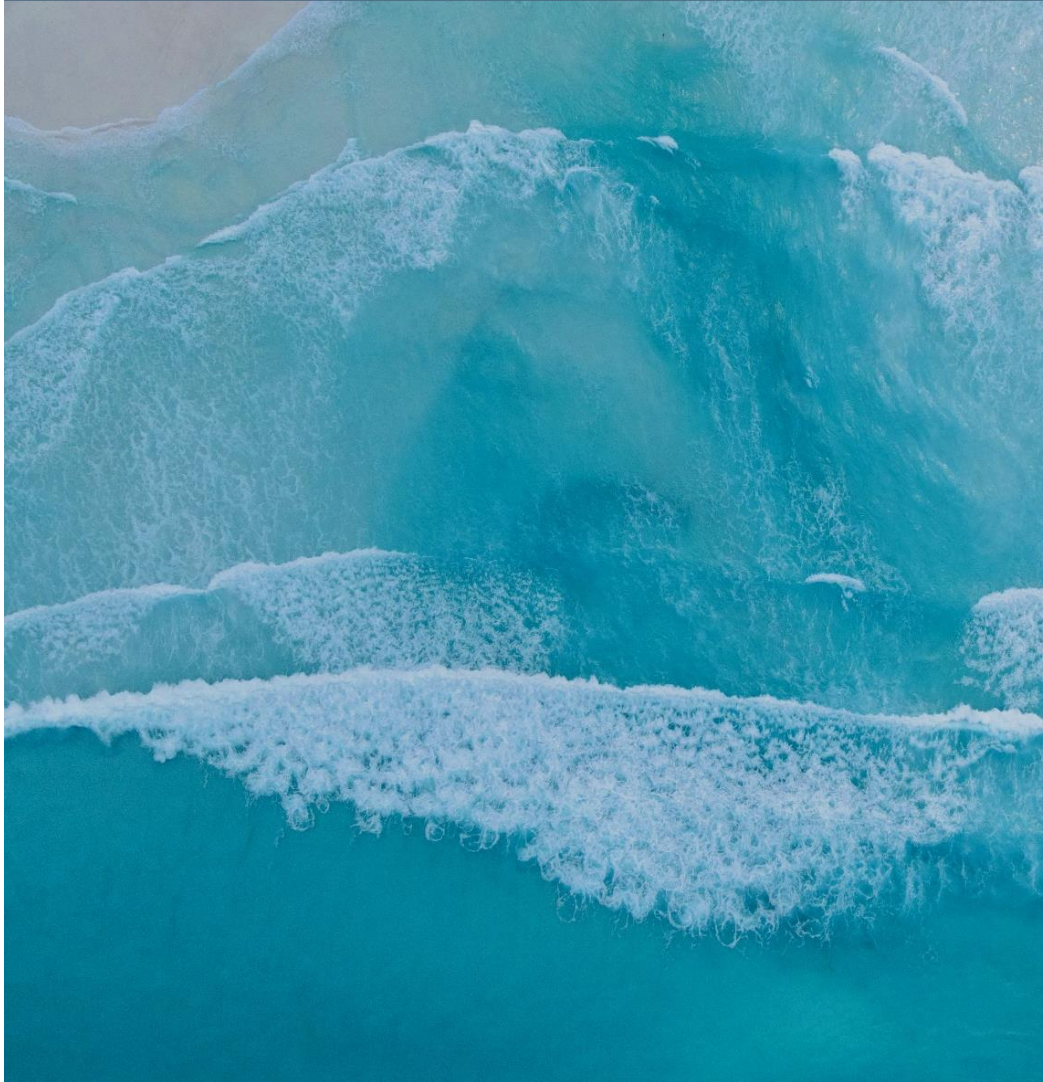
Equal Opportunity Statement: A document that confirms firm's commitment to equal opportunity principles, to ensuring that our workplaces are free from discriminatory practices, and that addresses rights, responsibilities and reporting with respect to unlawful discrimination.

Diversity Statement and Strategy: A document which sets out the firm's strategy on diversity, which is a commitment by the firm to building and developing a talented and diverse workforce. Among other things the strategy confirms the firm's approach to equal remuneration for work of equal value achieved by application of a rigorous remuneration review process.

Whistleblower Policy: This policy provides guidance for our people and other eligible whistleblowers to report any concerns of misconduct and other reportable information concerning the firm, including any concerns in respect of modern slavery, in accordance with relevant whistleblower protection laws. The policy provides a dedicated channel for the receipt of whistleblowing reports.

Anti-Bribery and Corruption Policy: This policy confirms the firm's approach to any involvement by our people in bribery or corruption.

Disciplinary Action Policy: This policy sets out, among other things, the disciplinary action that will be taken if any person breaches any of the firm's policies.



Action Taken

During the reporting period, we enhanced our governance and operations by taking steps to introduce new policies and update others, with aims to ensure compliance with relevant laws, and to bolster the firm's commitment to identifying, minimising and remedying modern slavery risks in our operations. In particular:

- we took steps to update the provisions of the firm's Procurement Policy in regards to modern slavery. The policy has been amended to include reference to the newly developed Modern Slavery Supplier Declaration, to allow procurement staff options and flexibility in ensuring appropriate modern slavery commitments are in place with suppliers in situations where negotiating such commitments into the supply contract are not practical or appropriate.
- key staff involved in the procurement process, including staff from Human Resources, Marketing, IT and Operations/Finance teams, have been individually trained in respect of the Procurement Policy and in particular detail with regard to the requirements to issue the Modern Slavery Supplier Questionnaire and where appropriate the Modern Slavery Supplier Declaration for all new and renewed supply arrangements.
- the firm's IT team renewed their supplier onboarding processes, including with the introduction of the new Third Party Supplier Security Policy, and formally rolling the issuance of Modern Slavery Supplier Questionnaire and the Modern Slavery Supplier Declaration into their wider onboarding processes.
- in consultation with the firm's employment and workplace relations experts, we supplemented the firm's Workplace Behaviour policy with firmwide training as well as targeted training sessions for partners, firm leadership, human resources staff, and other designated contact persons, in order to affirm our commitment to provide a safe, healthy, inclusive and respectful workplace for all partners and staff, free from inappropriate and unlawful behaviour. The training sessions specifically addressed the broadened reporting mechanisms for staff to report their workplace-related concerns, and prepared contact persons to receive such concerns using a person-centred approach.
- in line with new requirements under the Work Health and Safety Regulations 2011 (Cth), the firm appointed a committee to meet quarterly to review the firm's risk register for the purposes of identifying and managing human resources risks to the firm including psychosocial risks.

WITHIN OUR SUPPLY CHAIN

We consider that it is our supply chain rather than our operations that may continue to pose the greatest risk of incidences of modern slavery. While our supply chain remains steady from the previous reporting period, our knowledge of our supply chain continues to develop.

We continue to assess the modern slavery risk of each of our suppliers against the following key factors:

- the sector/industry the supplier is in;
- the products and services being supplied; and
- geographic risks (per the Global Slavery Index 2023)

We continue to identify the following key supplier categories as being of higher risk of incidence of Modern Slavery:

Our offices: leased in 6 Australian states and territories: the firm's occupancy costs are significant, included in this cost is office cleaning. The low-skilled nature of this work could mean that workers are people more vulnerable to exploitation by employers and risky modern slavery practices can be hidden by multiple tiers of contracting;

Technology including hardware: we rely heavily on technology to enable us to provide professional services to our clients. It is reported that the technology sector is at high risk of forced labour;

Branded Merchandise: we procure the production of branded stationary and merchandise. Branded merchandise often originates from countries listed in the Global Slavery Risk Index 2018 as having high vulnerability to modern slavery; and

Hospitality and catering: we host events and use hospitality and catering services. This industry can include workers that are more vulnerable to exploitation.

Action Taken

During the reporting period, we continued to directly engage with current and potential tier 1 suppliers regarding their operations and supply chains via our digital questionnaire, with the aims of assisting us in identifying any modern slavery risks that might affect our business, and assessing our suppliers and potential suppliers in regards to their comprehension of modern slavery risks, the development and sophistication of

their processes for managing such risks, and their willingness to engage with us in respect of modern slavery.

To date, the responses we have received have not revealed any instances of modern slavery, or of any clear risks of it. However, the levels of understanding of modern slavery risks and development and sophistication of the processes for managing them continues to vary widely. To date, approximately 20% of total respondent suppliers are subject to reporting obligations under the Modern Slavery Act or otherwise publish comprehensive modern slavery statements. Of the remainder, approximately:

- 19% report having comprehensive processes in place;
- 37% are in the planning stages or have processes partially underway; and
- 13% have not yet commenced planning to address modern slavery risks.

During the reporting period, we also took further steps to address modern slavery risks in our supply chains through contractual means. Inspired by the Australian Government's model contract clauses, we developed our existing simple template modern slavery clause to provide a range of options for use in supply contracts for suppliers of varying sophistication and modern slavery risk, and have included tailored and negotiated versions of these clauses in new and renewed supply contracts where appropriate.

In addition, to allow for flexibility in our onboarding and contracting processes, we have developed a comprehensive standalone modern slavery supplier declaration form, to be issued to suppliers (including existing suppliers already under contract) to seek written contractual commitments where it is not appropriate, practical or otherwise preferable to do so within the supply contract. We have also updated our procurement policy to address the availability of this option and have provided targeted training and instructions to individuals involved in the procurement process to assist them in rolling out the declaration.

Finally, we have developed benchmark minimum standards for suppliers based on their responses to our questionnaire including not dealing with new or renewing suppliers who don't complete the questionnaire or provide us with alternative comfort on their modern slavery practices, not accepting new or renewing suppliers who don't engage with us on modern slavery and not accepting new or renewing suppliers who are not willing to manage modern slavery risks in their business operations and supply chains.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

We are happy to report that we have not during the reporting period or to date received any responses to our supplier questionnaire or otherwise that indicate an unwillingness to engage with us regarding modern slavery concerns. However, the response rate to our questionnaire remains an area of difficulty, and we have been met in some instances with a reluctance to engage via the questionnaire. Anecdotally, large sophisticated suppliers who prepare their own modern slavery statements prefer to refer us to their own published statements or internal policies rather than to complete the questionnaire.

We have however found that response rates are higher where completion of our questionnaire is presented as a part of our onboarding processes for new suppliers, or as a requirement of a renewal contract. With respect to ongoing existing suppliers under contract approached outside of the context of a new or renewal procurement, the response rate is approximately 26.9%. With the much higher response rate for suppliers approached in the context of a new or renewal engagement, the total response rate for all suppliers is raised to approximately 33.9%.

We will continue to pursue responses from suppliers and hope that this rate continues to improve as more and more existing supply arrangements come up for renewal.

We also reiterate that, beyond the questionnaire, further inquiries may be needed in respect of suppliers who have responded in a manner indicating a lack of understanding or action in respect to modern slavery risks. This is in addition to following up responses that acknowledge incidences of modern slavery or raise concerns, should such responses be received in future.

During this reporting period numerous staff members involved in supplier onboarding from our IT, Marketing and Human Resources teams have reached out for assistance and guidance in approaching and responding to suppliers in relation to our supplier questionnaire and declaration, showing an awareness of their obligations relating to modern slavery under the procurement policy, an appreciation of the need for our procurement processes to address modern slavery concerns and a willingness to adapt their approaches to enable this to occur. Regardless, we think there is room for continual improvement in this area. For this reason and also due to staff expansion or changeover in the relevant teams involved in procurement, we anticipate that additional training will assist to strengthen our effectiveness in this area.

THE FUTURE

We are committed to continuous improvement of our Modern Slavery practices and in the next reporting period we aim to:

- pursue new and existing suppliers who have not yet responded to our modern slavery questionnaire;
- seek more information in response to any suppliers whose questionnaire responses are limited or raise particular concerns;
- prepare a response and action plan for suppliers who fail to meet our benchmark minimum standards, or whose response indicates a clear lack of understanding or action in respect to modern slavery risks; and
- run an additional refresher training session for procurement staff.

APPROVAL

This Modern Slavery Statement was approved by the Management Committee of Johnson Winter Slattery in their capacity as its principal governing body on 27 November 2024.

Signed by a responsible member of the Management Committee:



JEREMY DAVIS

Managing Partner,
Johnson Winter Slattery



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