



Modern Slavery Statement

December 2023

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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 second modern slavery statement, which has been prepared in accordance with the Modern Slavery Act for the reporting period FY2022 – 2023 (**reporting period**).

Johnson Winter Slattery is a partnership operating in Australia with its registered address at Level 9, 211 Victoria Square Adelaide SA 5000. 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

OUR OPERATIONS

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.

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 87 partners, supported by more than 300 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

Our firm remains committed to conducting its business in an ethical way that avoids causing or contributing to adverse human rights impacts, exploitation and any kind of discriminatory conduct.

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, we do not rely on migrant skilled or unskilled workers or a transient/gig workforce;
- we regularly review our recruitment practices, we 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.

Workplace Behaviour Policy: A policy confirming 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 reporting, handling and investigating workplace behaviour complaints.

Equal Opportunity Policy: A policy providing the framework to ensure that our workplaces are free from discriminatory practices.

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 introduces a dedicated channel for the receipt of whistleblowing reports.

Anti - Bribery and Corruption Policy: This policy confirms the firm's no tolerance approach to any involvement, by our people, in bribery or corruption.

Disciplinary Action Policy: This policy set 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 prepare and introduce a new Procurement Policy to, among other goals, raise awareness within the firm of modern slavery risks arising from our procurement operations. The policy includes targeted procedures to assist in the identification, assessment and prevention of modern slavery risks in our supply chains. The policy has been supplemented with targeted mandatory training sessions for relevant staff responsible for procurement, including from Human Resources, Marketing, IT and Operations/Finance teams.
- we consulted with the firm's whistleblowing experts and took steps to prepare and release the new Whistleblowing Policy which provides partners, staff and other eligible third parties with a dedicated channel to report their concerns to the firm, including any concerns relating to modern slavery in our operations or supply chain.
- we consulted with the firm's employment and workplace relations experts and took steps to prepare and release refreshed Workplace Behaviour and Workplace Health and Safety policies to align with the changing legal landscape. These policies affirm our commitment to provide a safe, healthy, inclusive and respectful workplace for all partners and staff, free from inappropriate and unlawful behaviour. These policies also provide broadened reporting mechanisms for staff to report their workplace-related concerns.



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 largely unchanged 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 Risk 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.

We have maintained our relationship with a Human Rights Expert, with whom we will consult to ensure effective and swift action can be taken in the event we identify an incidence of Modern Slavery in our own operations or in the operations of our supply chain.



Action Taken

During the reporting period, we took steps to directly engage with our tier 1 suppliers regarding their operations and supply chains. We took this action with the hope that it would not only assist us in identifying any modern slavery risks that might affect our business, but also to assess our 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.

We ultimately determined to use a digital questionnaire as a means of interrogation, and we are at the time of this publication, still in the process of receiving, collating and analysing these results.

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 varies widely. For example, approximately 15% of respondents are subject to reporting obligations under the Modern Slavery Act or otherwise publish comprehensive modern slavery statements. Of the remainder, approximately:

- 10% report having comprehensive processes in place;
- 46% are in the planning stages or have processes partially underway; and
- 10% have not yet commenced planning to address modern slavery risks.

In order to ensure that our questionnaire is widely adopted and to enable us to monitor our supply chain on an ongoing basis, we included in our new Procurement Policy:

- a requirement to issue the questionnaire to all new suppliers prior to procuring goods and services from them; and
- a requirement to re-issue the questionnaire to existing suppliers in respect of each new procurement, or contract renewal.

During the reporting period, we also took steps to address modern slavery risks in our supply chains through contractual means. We developed a simple template modern slavery clause for use in supplier contracts and have used this in our procurement arrangements. This action was supported with the inclusion in the Procurement Policy of a requirement to include modern slavery clauses in supply contracts going forward.

The modern slavery training provided to our staff involved in procurement of goods and services in respect of the new Procurement Policy included specific training regarding the modern slavery supplier questionnaire and the new contractual requirement.



ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

At this early stage in our development of a framework to address modern slavery risks, we have yet to capture enough measureable data and information to allow us to determine 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 that indicate an unwillingness to engage with us regarding modern slavery concerns. However, we have not yet received responses from all suppliers, and this is an area of difficulty. We will continue to pursue these responses. We are hopeful that, on an ongoing basis following the implementation of the Procurement Policy, suppliers will be more willing to respond when a new procurement or contract renewal is contingent upon their satisfactory completion of the questionnaire. We also note 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.

Anecdotally, following our targeted training, we have received feedback and engagement from a large proportion of the staff involved in procurement, indicating an understanding of the new procurement obligations and a willingness to engage in application of the relevant principles and requirements to their specific circumstances.

THE FUTURE

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

- pursue existing suppliers who have not yet responded to our modern slavery questionnaire;
- seek more information in response to suppliers whose questionnaire responses are limited or raise particular concerns;
- set benchmark minimum standards for suppliers;
- develop the current template modern slavery clause to provide a range of options for use in supply contracts for suppliers of varying sophistication and levels of modern slavery risk;
- in accordance with the firm's Procurement Policy, include a modern slavery clause in all new and renewed supply contracts where possible, or develop an alternative mechanism to seek commitments from suppliers where it is not practical to do so in the supply contract.

CONSULTATION AND APPROVAL

This Modern Slavery Statement was prepared by Johnson Winter Slattery's General Counsel's Office in consultation with the Managing Partner, the People & Development Director, the National Payroll & Facilities Manager, the Chief Financial Officer, Chief Information Officer and other relevant support functions.

This Modern Slavery Statement was approved by the Management Committee of Johnson Winter Slattery in their capacity as its principal governing body on 21 December 2023.

Signed by a responsible member of the Management Committee:



JEREMY DAVIS

**Managing Partner
Johnson Winter Slattery**



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