



Modern Slavery Statement FY24

This Modern Slavery Statement (Statement) is delivered 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 MinterEllison Consulting Pty Ltd. 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 2023 to 30 June 2024. It was approved by the MinterEllison Partnership Board on 28 November 2024 and the Minter Ellison Services Pty Ltd Board on 3 December 2024.

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MinterEllison's Purpose and Values

We are an Australian based law firm and our purpose is to create sustainable value with our clients, our people and our communities. Our values include excellence in all its forms, curiosity and innovation to help solve complex challenges for our clients and our business, and working collaboratively with each other and our clients.

These values underpin our approach to how we work with our people, our clients and our community to ensure they have a consistent experience that reflects our purpose and values. We strive to create an inclusive workplace environment which nurtures wellbeing and sustainability. Our environmental, social, and governance (ESG) framework is centred on ensuring our responsible business policies and processes set the context for sustainable management practices in our operations and our supply chain. Our approach to governance across the firm is grounded by our focus and commitment to accountability and transparency, again a reflection of our core values.

We make this Statement as a further commitment to fulfilling our purpose. Reducing the risks of Modern Slavery as that term is defined under Australian law in our operations and supply chain is one of the many ways we seek to positively impact our clients and the people who are directly and indirectly involved in our firm's business.

With a strong commitment to continuous improvement and a preparedness to undertake the work necessary to minimise the risk of Modern Slavery in our operations and supply chain, we outline in this Statement our firm's current approach, and future commitments to understanding, identifying, addressing and transparently reporting on our Modern Slavery risks.

Our structure and operations

MinterEllison is a partnership led by Chief Executive Officer and Managing Partner, Virginia Briggs and the Executive Leadership Team. The Partnership Board, chaired by Andrew Rentoul provides oversight and guidance to the firm's Leadership Team.

The MinterEllison Partnership provides a full range of corporate and commercial legal services to our clients which span both private, not for profit and Government sectors across various industries. In addition to our core legal services, MinterEllison operates a number of complementary businesses, including MinterEllison Flex addressing temporary legal and related resourcing needs.

Further, Minter Ellison Services Pty Ltd, acting as trustee of a services trust supports our internal operations.

We also offer an integrated suite of consulting services through the MinterEllison Consulting Partnership (ABN 50 017 469 292) via MinterEllison

Consulting Pty Ltd, covering technology, cyber security, risk and regulatory, ESG, Education and Legal Optimisation.

(All entities referred to in this Statement will be collectively referred to as **MinterEllison**).

MinterEllison directly employs over 2,600 people working in Adelaide, Brisbane, Canberra, Melbourne, Perth, Sydney and London.

During FY24, at various times approximately 2-5% of our workforce was engaged through external agencies or labour hire. This approach was specifically tailored to address areas of immediate need, such as IT resourcing for key projects or parental leave and for catering events.

MinterEllison also works with a network of associated entities in New Zealand, Asia, and on the Gold Coast, including MinterEllison LLP (Hong Kong), MinterEllison RuddWatts (New Zealand) and MinterEllison Gold Coast. These associated entities are operationally

aligned with MinterEllison but not financially integrated.

Distribution of workforce by location as at 30 June 2024	%
Adelaide	5
Brisbane	21
Canberra	6
Melbourne	29
Perth	5
Sydney	34
Overseas offices	<1

Our supply chain

As a professional services firm, 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 we procure come from suppliers based in Australia (which has a low prevalence of Modern Slavery according to the Walk Free Foundation's Global Slavery Index).

The main categories of goods and services 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 and promotional 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:**
This includes taxation, external legal counsel, consulting services and professional and personal development and wellbeing training programs.
- **Office facilities management:**
The services we use to maintain our offices, include leasing, office maintenance services, utilities, cleaning and security, waste management, recycling, office fit-outs and office relocation services.
- **Mobility and travel:**
This includes vehicle and airplane travel and accommodation.
- **Hospitality and catering:**
This includes onsite and offsite catering and events.
- **Business labour support functions:**
This includes recruitment services for our firm and to meet temporary legal and resourcing needs for clients.
- **Uniforms:**
This includes company uniforms for some business operations and hospitality employees.

Identifying Modern Slavery risks

We recognise that Modern Slavery is a global problem which requires a co-ordinated response from governments and businesses alike. In our approach to Modern Slavery, we have taken guidance from:

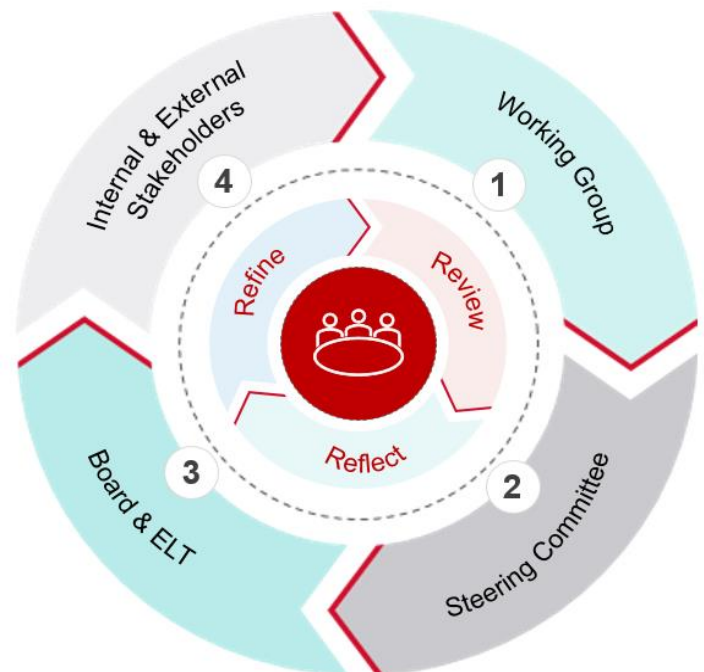
- the Commonwealth *Modern Slavery Act 2018* – Guidance for Reporting Entities developed by the Department of Home Affairs;
- the UN Guiding Principles on Business and Human Rights which sets the standard for countries and companies to prevent, address and remedy human rights abuses committed in business 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 child labour. While poor labour practices such as substandard working conditions or underpayment of workers may not meet the legal definition of Modern Slavery on their own, we understand these forms of exploitation are high risk factors that may lead to Modern Slavery over time. Modern Slavery can occur in any industry, at any point in the supply chain, and is often difficult to detect.

High risk industries identified in the Australian Council of Superannuation Investors Modern Slavery Report¹ which are relevant to MinterEllison's business include: IT procurement; logistics and property and building services such as facilities management, utilities, cleaning, waste management and security; print and promotional goods. High risk geographies include conflict-affected zones and countries where there is a weak rule of law or high corruption. Countries where the workforce includes a large number of migrant workers and where third-party employment agencies are widely used also present a higher risk of forced labour.

We also recognise the red flags that can contribute to the creation of conditions or circumstances that make individuals more vulnerable to exploitation potentially resulting in Modern Slavery, including:

- complex and long supply chains with many intermediaries;
- supply chains which are heavily reliant on low-skilled, migrant seasonal or low-skilled workers;
- companies using their market dominance to exert pressures on their suppliers to reduce costs;
- certain types of products and services which are low margin, including hazardous or unregulated manufacturing processes or use of hazardous types of raw materials; and
- country of sourcing – according to international human rights reports, some countries have a higher prevalence of modern slavery. This is often associated with a weak rule of law, poor governance practices, conflict, migration flows and socio-economic factors such as poverty.



¹ [ACSI-Modern-Slavery-Report.Feb19.pdf](#)

Assessing and addressing the risks of Modern Slavery in our operations and supply chain



Approach to risk assessment

We apply a risk based methodology to assess Modern Slavery risks in our operations and supply chain. Our risk assessment methodology is developed taking into account a range of risk factors, including risks associated with geographic locations, industries, types of products and services and business models. We concentrate on identifying and mitigating material risks within our operations and supply chain.

Our Modern Slavery Working Group (**Working Group**) was established in FY20, and comprises members of our Risk, Procurement, ICT and other Business Operations leaders as well as client practice group specialists with deep knowledge of our Firm's supply chain. The Working Group continues to be responsible for implementing the firm's Modern Slavery Action Plan with oversight and guidance provided by the Modern Slavery Steering Committee (**Steering Committee**) which reports to the MinterEllison Partnership Board.

The Steering Committee includes partners who lead our firm's Modern Slavery risk management practice, General Counsel, Chief Operating Officer, Chief Risk Officer and Chief Community Officer. We introduced a Supplier Risk Management Framework on 3 June 2024 which includes the totality of our management systems, structures, policies, processes and people within business operations that identify, assess, manage, mitigate and monitor all internal and external sources of inherent risk that could have a material impact that could arise from supplier-related issues on our organisation's operations, financial performance, legal compliance, reputation, and strategic objectives.



Operations

We have established procedures to ensure MinterEllison adheres to relevant employment laws in our business operations. We enter into employment contracts with our employees and service agreements with our contractors. Our commitment to having a fair and transparent workplace extends to ensuring we meet minimum wage standards, which applies to those people protected by the Legal Services Award 2020, including, clerical and administrative employees,

law graduates, law clerks and any other relevant awards within our workplace.

We are committed to creating a culture where our people are encouraged to voice their concerns or grievances without fear of retaliation. The specific procedures for doing so can be found in our established workplace policies and processes.

Based on our investigations and our risk assessments during the reporting period, we assessed the risk of our direct operations directly causing or contributing to modern slavery to be **low** as a legal and consulting firm. However, we acknowledge the importance of ongoing monitoring and vigilance to identify any emerging Modern Slavery risks.



Supply Chain

In FY24, we continued to assess the Modern Slavery risks associated with our suppliers through a process that includes both quantitative and qualitative methods. This evaluation included the use of a Modern Slavery Questionnaire (**Questionnaire**) and a risk assessment matrix tool which we applied across our supplier Questionnaires which raises 'red flags' for factors including: the location of the business or service; where the product is made/developed; the location of where post-sale services will be carried out; subcontractor arrangements; composition of workers; types of labour; existence of Modern Slavery Statements, related policies and procedures in the supplier's business; number of employees; compliance with our Procurement Compliance Standards; and independent certifications.

In addition to our Questionnaire based assessments, we monitored our suppliers through other sources, including industry reports, company profiles, and online research. This approach helped us investigate and address potential Modern Slavery risks among our suppliers.

Our data capture and reporting processes also identified instances where suppliers declined to complete our online Questionnaire for review purposes. If a supplier declined to complete our online Questionnaire, we undertook further risk assessment including an analysis of the information provided by the supplier (including their own Modern Slavery Statement, any relevant policies they supply and information available from their website) and our own information sources to evaluate the level of Modern Slavery risk associated with the particular supplier.

To ensure prompt action if medium or high Modern Slavery risks are identified during our assessments, MinterEllison has established an escalation process designed to respond quickly and effectively to any identified risks arising from either the supplier's Questionnaire responses or our other enquiries. This process applies to risks identified through supplier Questionnaire responses or other inquiries.

In FY24, if the procurement team identified a potential Modern Slavery risk, they first reported the details of this risk along with any related concerns to a designated expert on Modern Slavery within our organisation. The Modern Slavery subject matter expert then reviewed the risk assessment and additional due diligence may have been undertaken. If they continued to have concerns after their initial evaluation, the issue would be escalated to the Chief Risk Office which may gather more information from the supplier or about them to better understand the specific risks identified. If, after this further review, concerns regarding Modern Slavery risks persisted, our Procurement and Chief Risk Office teams would implement our response and remediation plan.



Supply Chain- ICT Suppliers

We have previously identified the Information and Communications Technology (ICT) sector poses higher levels of risk of forced labour in specific regions. Additionally, there is a general scarcity of public information on ICT supply chain management, particularly about the sourcing of materials and components used in ICT hardware. Therefore, there continues to be an inherent risk that procurement of ICT hardware is linked to Modern Slavery practices, most prevalent in the raw material extraction, manufacturing and disposal stages.

We monitor ICT risks in our supply chain by assessing the risk profile of our ICT suppliers, including software providers, by requiring our suppliers to complete our online Questionnaire and conducting investigations through various sources, including industry reports, company profiles, and online research as outlined above.

We assess our ICT suppliers' responses to our Questionnaire by using our Modern Slavery risk assessment matrix tool and follow the processes outlined above.

Several of our ICT suppliers are headquartered in or have engaged subcontractors (for example a global support model that included post-sale services) in countries with a higher prevalence of Modern Slavery, according to the Walk Free Foundation's Global Slavery Index, including India and the Philippines. However the application of our risk assessment methodology to the Questionnaire responses from those ICT suppliers in FY24 produced no medium or high risk ratings.

Therefore, our assessment is that our overall risk of causing or contributing to Modern Slavery through our procurement of ICT goods and services is **low**.

However, despite this scoring, we recognise that the risk of being directly linked to Modern Slavery is higher where the ICT supplier is based in, or sources or manufactures product or labour from a country associated with a higher prevalence of Modern Slavery.



Supply chain- Other non ICT suppliers

During FY24, we continued to use our Questionnaire to engage with non-ICT suppliers, including suppliers which participate in our competitive tender process.

We recognise the following non ICT procurement categories as having a higher inherent risk of potential modern slavery practices:

- Promotional and branded items and uniforms;
- Facilities management including cleaning, security, waste management and disposal and recycling services;
- Hospitality, accommodation, food and catering services; and
- Business support and labour hire.

We continued to perform a risk based assessment of our non-ICT suppliers against a range of Modern Slavery risk indicators as outlined above.

Regarding the identification and escalation of risks for our non-ICT suppliers, we follow the same processes as for ICT suppliers.

Regarding non-ICT suppliers, the application of our risk assessment methodology to the Questionnaire responses from those non-ICT suppliers completing Questionnaires in FY24 produced no medium or high risk ratings during the reporting period.

As a result, we assess that our overall risk of causing or contributing to Modern Slavery through the procurement of non-ICT goods and services is **low**. Nevertheless, we recognise that the risk of being directly linked to Modern Slavery is higher where the non-ICT supplier is based in, sources or manufactures product, or uses labour from a country associated with a higher prevalence of Modern Slavery. We recognise that our first-tier suppliers are part of intricate supply chains, and we are aware that the risk of modern slavery could increase further down these chains, particularly in tiers beyond our direct oversight where transparency is often reduced.



MinterEllison policies

Our assessment of the risk of Modern Slavery in our operations and supply chain has been carried out against the background of our existing policies and procedures aimed at ensuring a safe and fair working environment for our people and our suppliers. These policies, which are reviewed and updated regularly 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; and
- discrimination, harassment, sexual harassment and bullying.

■ Code of Conduct

This sets out how all members of our firm must conduct themselves to uphold our values and deliver on our purpose to create sustainable value with our clients, our people and our communities.

■ Diversity and Inclusion

This policy aims at leveraging our diversity through nurturing a culture of inclusion and collaboration to deliver a workplace experience for our people consistent with our values.

■ 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 and Compliance Standards

We recognise that we have a significant opportunity to drive positive social, economic and environmental outcomes through the approach we take to procuring goods and services. This commitment underpins our Responsible Procurement Policy and models MinterEllison's support for sustainable ways of working.

Our Responsible Procurement policy seeks to ensure that the goods and services we purchase through our supply chain are:

- delivering value for our business, our clients and our communities;
- consistent with, or at a minimum reflect the ethical commitment set out in the principles of the UN Global Compact; and
- consistent with our commitment to full and fair opportunity.

■ Responsible Business Statement

This Statement outlines our commitment to upholding the human rights of our people and those working in our supply chain. It also outlines how our people and third parties can raise a complaint or concern about behaviour by MinterEllison, our suppliers or their subcontractors that is not aligned to the Statement or our Procurement Compliance Standards.

■ Whistleblower Policy

This policy sets out the procedures and reporting channels available to our people 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 is a key policy supporting the firm's **Speak Up** program available to all members of our firm.

■ Sustainable ways of working and flexible work

This policy sets out our approach and expectations towards sustainable ways of working to help build a culture where all of our people feel trusted, supported and able to create sustainable value for our clients, our people and our communities.



'Review , Reflect and Refine' project

While we have not identified any additional factors indicating a change in the risk profile for our supply chain compared to the previous reporting period, we recognise the landscape of Modern Slavery risks is constantly evolving.

To keep up with increasing requirements and client expectations, in FY24 a 'Review , Reflect and Refine' project (**Project**) focusing on our Modern Slavery risk matrix methodology, associated tools, ancillary documents, and policies was commissioned by the Modern Slavery Steering Committee, in conjunction with a major Procurement upgrade. The review pinpointed several key areas where improvements could be made to address:

- **Subjective Qualitative Assessments:** The current methodology leans heavily on subjective assessments, which increases the potential for human error. To address this, we aim to integrate more quantitative metrics and data-driven analysis by introducing data analytics into our risk assessment process.
- **Reliance on Self-Reported Data:** We identified a need to reduce our dependence on self-reported questionnaires, recognising the limitations of this approach due to the lack of verifiable data from suppliers. Going forward, we will seek to incorporate third-party verification from objective data sources.
- **Manual Assessment Effort:** The significant manual effort involved in supplier risk assessments has been highlighted as inefficient. To improve this, we explored automated solutions and software as part of a firm wide Procurement project in FY24, which amongst other improvements explored ways to streamline the Modern Slavery risk assessment process, reduce the manual workload, and increase accuracy.
- **Reporting improvements:** The review showed that our general procurement and in particular our Modern Slavery reporting mechanisms should be optimised to provide

more timely and actionable insights and dynamic reporting tools that allow for real-time analysis and transparency.

- **Monitoring complex supplier supply chains** and Modern Slavery risks was hampered by delayed insights into supplier credentials. In FY24, we looked to implement more proactive monitoring solutions that would provide continuous and updated information about our suppliers.

The key actions from the Project were to identify and implement an automated risk screening and due diligence software tool that provides verified and independent third-party data about our suppliers. These developments will better align our practices with evolving requirements and client expectations, ensuring a robust and responsible approach to Modern Slavery risk management.

We embarked on the Project to closely examine our Modern Slavery risk assessment procedures and ancillary policies and standards across the lifecycle of our supply chain. Here is a summary of the key improvements made in FY24 which will deliver a more robust and responsible approach to Modern Slavery risk management.

1. Revision of our Responsible Procurement Standards:

Emphasising Modern Slavery risk management and ensuring an ethical supply chain.

2. Creation of a Responsible Business Statement:

This statement is now available on our website: [Responsible procurement and modern slavery](#)

3. Reviewing Modern Slavery Clauses and Risk Management Processes:

We updated our template Modern Slavery clauses in our supplier agreements in the context of our review of supplier procurement and risk escalation procedures.

4. Website Updates:

Enhancing our [Responsible procurement and modern slavery](#) web page, creating a dedicated SharePoint page and extending whistleblowing contact addresses to include both Procurement and the Chief Risk Office.

5. Policy Alignment:

Reviewing and updating our Modern Slavery policy to ensure alignment with legislative obligations and firm wide statements and processes.

6. Supplier Risk Management Framework (SRMF):

The Chief Risk Officer developed a SRMF to assess and manage risks posed by suppliers, covering the entire lifecycle of the supplier relationship. The SRMF includes a register of High Risk Suppliers and defines management approaches, assigning roles and responsibilities within the firm.

7. Escalation Process for Identified Risks:

We established a new efficient escalation process to ensure prompt action when medium or high Modern Slavery risks are identified. Our Procurement team escalates any concerns to Modern Slavery subject matter experts in the firm, and then to the Chief Risk Office for determination and to inform our response and remediation plan.

8. Simplification of our Questionnaires:

In FY24, we continued to monitor our suppliers through industry reports, company profiles, and online research. We recognised during our review that beyond website research our process would benefit from independently verified data to test information provided by suppliers and therefore improve identification of risks in our supply chain.

9. Identifying a software tool to provide automated screening and tracking of supplier credentials to identify Modern Slavery risks with the aim of implementing the tool in Q1 of FY25.



Small Suppliers

To help small suppliers which lack resources to understand Modern Slavery risks, we developed an easy to understand information sheet (**Modern Slavery Guide**) and short form questionnaire. We have been sending short form questionnaires to small suppliers during FY24.



Cleaning services

Another potential Modern Slavery risk we have identified through our risk assessment processes 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 recognise cleaning services may be at higher risk of Modern Slavery abuses with the potential for low skilled and migrant workforces presenting opportunities for exploitation and layers of subcontracting also obscuring labour conditions. These types of services may be indirectly procured by the firm through outsourcing and third party contracting arrangements.

A planned review of our landlords' contracting arrangements was deferred until the introduction of a supplier due diligence

software tool in FY25. We will then liaise with our landlords and conduct targeted screening on Modern Slavery risks in premises related services within their supply chains.



Perth Office Fit out Case study

- **Background:** In FY24, the fit-out of our new office premises in Perth provided a practical case study to use as a review of our procurement processes as they relate to assessing Modern Slavery risk. The project's scope offered a valuable opportunity to apply, assess, and refine our approach to ensuring compliance with Modern Slavery legislation and our firm's Procurement Compliance Standards.
- **Process:** During the fit-out:
 - Key contractors were required to complete our Modern Slavery questionnaires, including project management, architecture, builders, engineering, furniture, fit out, removalists and relocation specialists.
 - For subcontractors, reliance was placed on the head contractors' assurances rather than direct questionnaire completion.
 - The procurement team engaged in discussions with contractors to address any identified concerns or gaps within their Modern Slavery policies or questionnaire responses.
- **Challenges:** The review identified several challenges:
 - A notable gap was identified in our due diligence process as subcontractors were not directly completing modern slavery questionnaires, leading to a paucity of information about our contractors' supply chains.
 - Further, there was a lack of documented evidence to demonstrate the continuous monitoring of modern slavery risks during the fit-out process.
- **Key Learnings:**
 - **Direct involvement:** Where possible we will conduct checks on contractors and subcontractors to ensure adequate Modern Slavery risk assessment practices.
 - **Ongoing vigilance:** Ensuring ongoing monitoring to manage the risk of modern slavery effectively for the duration of the whole project.
 - **Regular updates:** Keeping senior management informed regularly about modern slavery compliance is crucial for oversight and responsibility.
- **Conclusion:** The Perth office fit-out served as a pivotal case for applying our Modern Slavery procurement processes. The experience has underscored the need for rigorous due diligence and ongoing compliance checks. As a result, we are instituting a more robust framework for

future projects that includes compulsory direct engagement with all service providers, continuous risk monitoring, and enhanced reporting. These measures reflect our firm's commitment to combatting Modern Slavery and maintaining the highest ethical standards within our supply chains.



Updating our Supplier Contracts

We have updated our supplier contracts to include Modern Slavery provisions. If the supplier tries to resist our standard terms, this is then escalated to a Modern Slavery expert and our Chief Risk Office for determination.



Refining our processes

We focused on engaging with suppliers in the tender process, before onboarding or contract renewal to undertake Modern Slavery risk assessments and promote ethical practices in our supply chain.

We also continued to develop our escalation processes to respond promptly and effectively to any identified risks arising from either our Questionnaire or other enquiries. This includes the implementation of our response and remediation plan.



Training and Education of our people

Members of our procurement team have participated in training events, including Modern Slavery webinars, procurement roundtables, and training conducted by around ESG Procurement. This initiative was undertaken to deepen their understanding of the risks and indicators associated with Modern Slavery and to ensure that these insights are applied in our operations.

To reinforce our educational focus, our Chief Community Officer has developed two new resources for our people:

- A dedicated Modern Slavery SharePoint page created to centralise information and enable better internal communication and management of Modern Slavery risks and upload training materials and useful links to articles, research and training.

- An external Responsible Business and ESG webpage, accessible publicly, which provides detailed insights into our firm's commitment to ethical practices. It includes direct links to our Responsible Procurement webpage and outlines our Procurement Compliance Standards.

MinterEllison is committed to upholding strong Environmental, Social, and Governance (ESG) standards, and this commitment is ingrained in every facet of our business operations and supply chain management. The ESG communication shared across the firm underscores our dedication to protecting the human rights of not only our employees but also those within our supply chain. Furthermore, it sets forth our expectations for ethical conduct throughout the firm.

These actions and communications are a clear statement of our firm's dedication to ethical business practices and our proactive approach to combatting Modern Slavery.

We organised a Modern Slavery training session for the firm delivered by speakers from the Human Rights Law Centre (HRLC) on 12 June 2024. The speakers covered the HRLC's submission to the Senate inquiry into the *Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Bill 2023* (Cth), on proposed changes to legislation including powers of proposed MS Commissioner. The session was recorded and was provided to the whole firm through our Modern Slavery and Procurement SharePoint site.



Speak Up Portal and other reporting

We have made available a portal known as '**Speak Up**' as an option for our people to report:

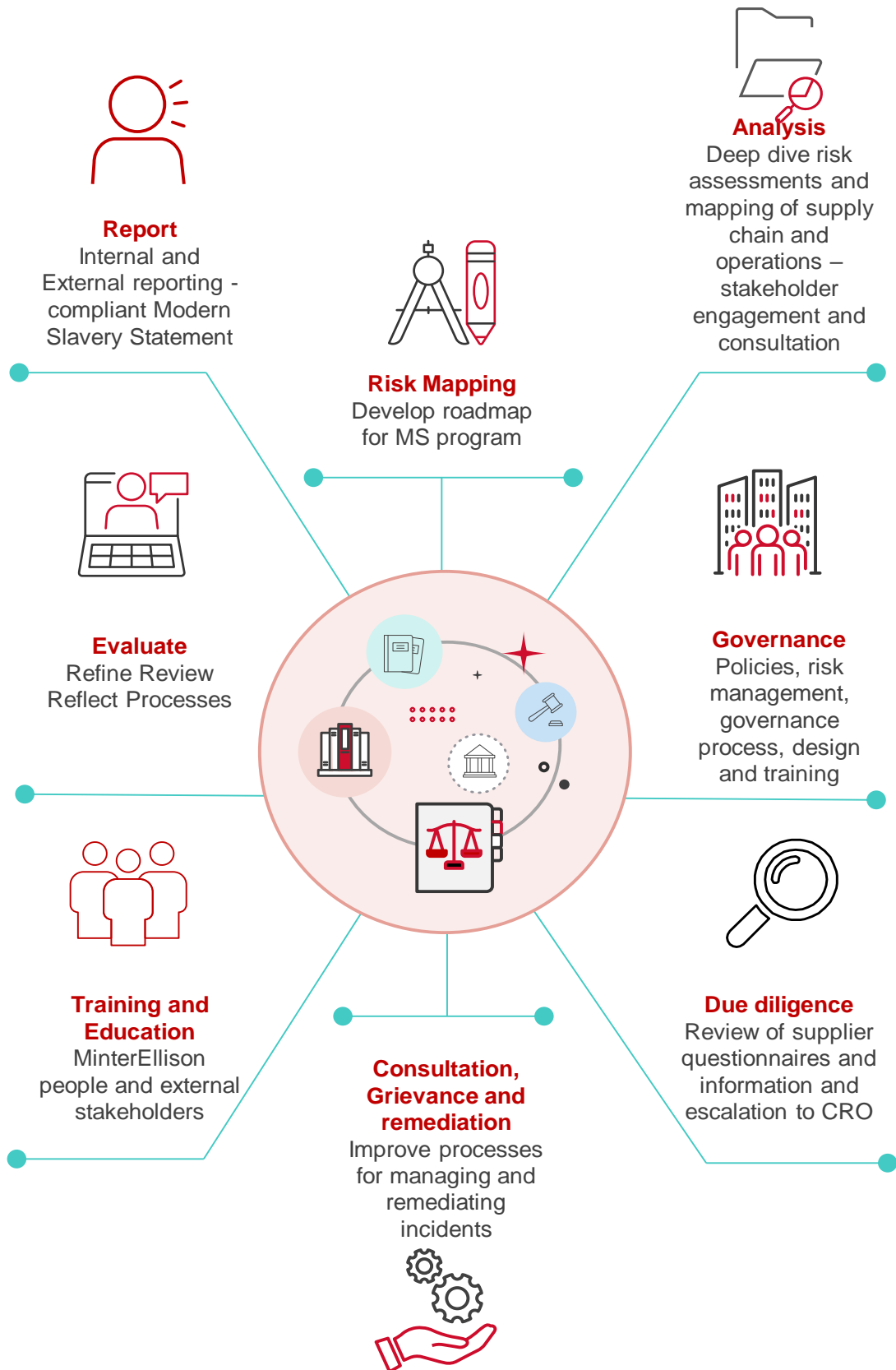
- unacceptable workplace behaviours;
- improper or illegal conduct;
- bribery and corruption;
- unethical conduct or professional misconduct; and
- unsafe work practices.

MinterEllison also provided to its people in Melbourne and Sydney a 2 hour workshop for Creating Respectful Workplaces as part of its commitment to providing an inclusive workplace culture where people feel safe and supported and can speak up.

In our people surveys, we include questions about our people's confidence in reporting issues and voicing concerns. This helps us gauge the level of trust amongst our people in these mechanisms and helps us identify opportunities to enhance our reporting processes.

Suppliers can report any concerns to MinterEllison by contacting meprocurement@minterellison.com and recently, we included our Chief Risk Office as a separate email contact cro@minterellison.com in our [Responsible Business Statement](#).

Our approach to Modern Slavery Risk Assessment and Mitigation



Summary of our Actions

During FY24, we focussed on implementing the future actions proposed in our FY23 Modern Slavery Statement. The below table tracks the progress and implementation status of each action throughout FY24.

FY23 Proposed Actions	FY24 Activity
Continue reviewing and refining our risk assessment process of suppliers to better identify risk and strengthen our supplier engagement around Modern Slavery	We have continued to refine our risk methodology and processes for addressing Modern Slavery risks in our operations and supply chain. Our focus in FY24 was to identify and implement an automated supplier risk screening and due diligence tool that provides verified and independent third-party data about our suppliers. A market scan was conducted to identify a tool which could assist the firm to reduce its risk exposure in this area. Due diligence has been completed and the Procurement Project Steering Committee approved the purchase of the software tool, for a 12 month trial. This software tool provides automatic screening and tracking of supplier credential to address Modern Slavery risks.
Improve our supplier data capture processes for our procurement activities within MinterEllison to continuously improve our operations and supply chain risk assessment processes.	<p>We completed a review of our data capture and analysis process to improve insights through the Project and a number of key changes were made as outlined on page 9, with further initiatives expected after the introduction of the software tool in Q1 FY25.</p> <p>In FY24, our procurement team engaged in discussions with contractors to address any identified concerns or gaps within their Modern Slavery policies or questionnaires for the Perth office fit-out. Key contractors were required to complete our Modern Slavery questionnaires.</p>
Continue to require our suppliers to adhere to our Responsible Procurement Standards (or equivalent standards provided by supplier).	<p>This work is ongoing as we continue to emphasise Modern Slavery risk management and ensuring an ethical supply chain.</p> <p>In FY24, our Chief Risk Officer developed the Supplier Risk Management Framework (SRMF) to assess and manage risks exposed by suppliers, covering the cycle of the supplier relationship. The SRMF includes a register of High Risk Suppliers and defines management approaches, assigning roles and responsibilities within the firm.</p>
To increase utilisation of Modern Slavery risk mitigation tools developed by the Working Group.	We have continued to apply our Modern Slavery risk mitigation tools and find ways to integrate them into the firm's procurement framework. Further process changes will occur in FY25 will occur after the introduction of the supplier due diligence software tool.
Review premises procurement practices and continue engagement with landlords and service providers in relation to Modern Slavery risks.	In FY24, we reviewed Modern Slavery clauses in our supplier agreements and our risk management processes. As a result we updated our template Modern Slavery clauses and our supplier contract review escalation procedures. This escalation process

FY23 Proposed Actions	FY24 Activity
	<p>ensures prompt actions when medium or high risk Modern Slavery risks are identified.</p> <p>In FY25, using the new software tool we will liaise with our landlords and conduct targeted screening on Modern Slavery risks in premises related services (including cleaning, security, waste management and recycling contracts) within their supply chains.</p>
<p>Conduct additional firm-wide training to increase awareness of Modern Slavery risks.</p>	<p>During FY24, we provided education and a training session to the firm by the HRLC. In addition, our Procurement team have attended Modern Slavery education webinars.</p> <p>We also completed a dedicated Modern Slavery intranet site with resources including learning modules and a new external Responsible Business web page - Responsible business and a separate webpage for Responsible procurement and modern slavery.</p> <p>In FY25 our firmwide induction program for new recruits will include information about our commitment to reducing the risk of Modern Slavery and access to our new firmwide resources.</p>
<p>Develop tools to assist smaller suppliers which lack resources to understand Modern Slavery risks, including by providing digestible information sheets.</p>	<p>We developed a new Modern Slavery Guide and Questionnaire for our small suppliers which will be introduced in FY25.</p>
<p>Continue to identify ways to raise awareness of our grievance mechanisms with potentially affected stakeholders.</p>	<p>We have a number of internal mechanisms and the anonymous Speak-Up portal for our people to raise concerns about unacceptable conduct including in relation to Modern Slavery related issues. We also have a dedicated Procurement email address and an email address for the Chief Risk Office for suppliers or third parties to contact us which is publicised on our Responsible Procurement webpage.</p>
<p>Continue to engage and collaborate with relevant external stakeholders to share good practice.</p>	<p>Membership of the AusLSA Legal Sector Alliance enabled our people to participate in Modern Slavery roundtable discussions with experts and share high level insights with other legal firms.</p> <p>We have also participated in a Responsible Procurement series of round tables with a group of people from other large law firms to share insights on responsible procurement and the Head of Procurement attended a webinar hosted by Givvable entitled, '<i>Biodiversity Webinar for Sustainability/ESG, Procurement and Risk & Compliance professionals</i>'.</p>
<p>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.</p>	<p>People responsible for MinterEllison's Modern Slavery practice have monitored the Commonwealth Government's review of the <i>Modern Slavery Act 2018</i> and distributed the <i>Report for the Review of the Modern Slavery Act 2018</i> internally to key stakeholders. This report makes 30 recommendations for</p>

FY23 Proposed Actions	FY24 Activity
	change which we will be closely monitoring in the next reporting period.
To develop and implement a remediation plan to address any findings of Modern Slavery practices in our supply chain.	We developed a response and remediation plan in FY23 which is being followed by our Procurement team and Chief Risk Office to ensure Modern Slavery findings or concerns are addressed promptly. Once the supplier due diligence software tool is operational we will be further developing our remediation process.
Other actions during reporting period.	In addition to the proposed actions set out in our FY24 Action Plan, our Chief Community Officer participated in a leaders' study tour which included a session delivered by Professor John McMillan who led the Commonwealth Government's review of on the <i>Modern Slavery Act 2018</i> and researchers from Monash University to discuss best practice Modern Slavery due diligence and disclosure.

Assessing the effectiveness of our actions to address Modern Slavery risks in FY24

Throughout FY24, our Modern Slavery Working Group and Steering Committee devoted significant time to assessing, reviewing and evaluating the effectiveness of our actions to identify and address Modern Slavery risks. These groups met quarterly in and the discussions and outcomes delivered have improved our processes and systems including increasing our investment in improved data sources to better manage our supply chain.

Highlights include:

- Regular Updates and Methodology Refinement: The Steering Committee received progress reports and reflected on insights to guide and refine our Modern Slavery risk assessment processes; methodology and associated procedures;
- Monitoring and Action Plan Progress: The Working Group and Steering Committee reviewed progress against the planned actions for the reporting period.
- Review and approval of the licensing of an automated supplier

risk screening and due diligence toolset to commence in Q1 FY25. The tool chosen uses verified, independent third-party data to enhance our risk assessment capabilities.

- Insights and new developments in Modern Slavery reporting under the Modern Slavery Act were regularly shared and discussed.
- The Executive Leadership Team and the MinterEllison Partnership Board was kept informed of the progress of our processes and actions about the identification and management of Modern Slavery risks.
- Our knowledge of our suppliers, their operations, and supply chains has been improved through their questionnaire responses and our investigative and engagement efforts.
- We have formalised and centralised our procurement processes including the development of a supplier risk management framework.

- Internal escalation processes under our response and remediation plan have been refined, ensuring that any identified risks are promptly escalated to a Modern Slavery subject matter expert, and then to the Chief Risk Officer.
- We believe these improvements have significantly strengthened our engagement with suppliers and our overall capability to assess and address Modern Slavery risks. We note that during the reporting period no instances of Modern Slavery were identified or reported through the firm's due diligence processes.



Consultation

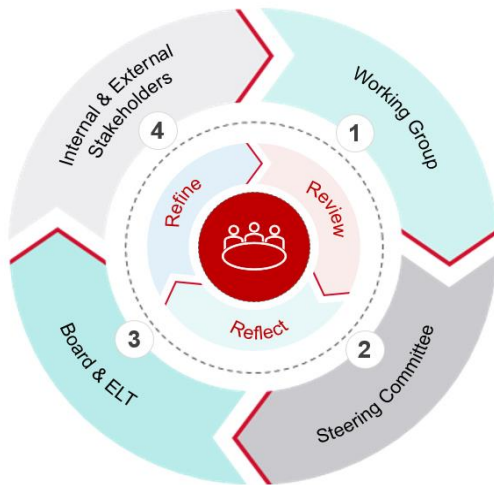
The Statement was prepared by the Modern Slavery Working Group with the guidance of the Modern Slavery Steering Committee. The Steering Committee includes partners who lead our firm's Modern Slavery risk management practice, General Counsel, Chief Operating Officer, Chief Risk Officer and Chief Community Officer. The Working Group includes members of our Risk, Procurement, ICT and other Business Operations leaders as well as client practice group specialists with deep knowledge of our Firm's supply chain. The Working Group develops, reviews and implements the Modern Slavery Action Plan and prepared this Statement.

MinterEllison also consulted with its owned and controlled entities in the development of this Statement. The Steering Committee referred the Statement to the MinterEllison Consulting Partnership, MinterEllison Consulting Pty Ltd and MinterEllison Services Pty Ltd for feedback. This enabled open discussion on the reporting requirements and future actions supports continuous improvement.

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



Commitment to continuous improvement: future initiatives



With our focus on continuous improvement and building on the knowledge gained from the Project, our plan is to take these actions during our subsequent reporting periods to reduce the risk of Modern Slavery in our supply chain:

- **Legislative alignment and risk awareness:** We will continue to monitor the Federal Government's response to the review of the Modern Slavery Act and review the firm's policy and processes to address Modern Slavery taking into account the recommendations of the review and emerging Modern Slavery risks and priorities;
- **Premises procurement and landlord engagement:** We will review our premises procurement processes and engage with the relevant people, following the introduction of supplier due diligence software tool and conduct tailored Modern Slavery training sessions. We will also focus on engagement with our landlords on cleaning, security, waste management and recycling contracts to manage Modern Slavery risks;
- **Firm-wide training:** We plan to conduct additional firm-wide training to increase awareness of Modern Slavery risks and legislative developments, including bystander and Modern Slavery training sessions for our people and new recruits. In addition, we will continue to train members of our Finance and Procurement teams to ensure we are capturing supplier data effectively to enable more detailed reporting about our suppliers, their location, spending and categories of procurement;
- **Enhanced supplier data processes:** In conjunction with the introduction of our new software tool, we aim to improve our supplier data capture to refine our Modern Slavery risk assessments and conduct a deep dive into our suppliers;
- **Implementing a new supplier due diligence software tool:** This innovative software tool will automate the screening and monitoring of supplier credentials, enabling us to proactively identify and mitigate Modern Slavery risks. It underscores our unwavering commitment to continually

refine our processes, strengthen our supplier due diligence, and ensure our supply chain remains free of Modern Slavery. We expect to deploy this tool in Q1 of FY25, which we anticipate will:

- **streamline** our Modern Slavery due diligence, with the **benefits** of mitigating human error associated with manual due diligence and enabling our Procurement and other specialist resources to be redirected towards strategic risk management activities;
- **monitor** suppliers in real-time which will provide us with the agility needed to respond promptly to any potential risks identified associated with Modern Slavery and continuously monitor risks in our supply chain;
- **be instrumental in conducting targeted searches** to assess potential risks associated with our suppliers, prioritising key suppliers and those in higher-risk categories. This risk-based approach will allow us to focus our resources effectively and efficiently;
- **generate actionable insights and red flags** to identify areas requiring deeper review. This will prioritise risks and shape effective mitigation strategies, including the formulation of additional supplier questions. These measures will be essential for maintaining compliance with evolving legal standards and meeting stakeholder expectations;
- **provide enhanced reporting** capabilities which should improve the quality and timeliness of our reports on Modern Slavery and other ESG risks. This aligns with the need for transparency in our operations and supply chain. The software tool will track certifications, accreditations, standards, ratings, scores, assessments, commitments, pledges, memberships, initiatives, or other actions and attributes that are independently or externally validated and align with ESG issues under widely-used reporting frameworks;
- **provide Learning Modules for Suppliers:** for suppliers lacking relevant credentials, the software tool's provider will issue learning modules on supply chain risks and labour practices. Suppliers completing these modules receive tags reflecting their maturity and awareness of the topics; and
- **provide regular information refresh:** the software tool's supplier refreshes supplier information quarterly, ensuring that we have the most up-to-date data. Any red flags, such as lapses in certifications, are promptly brought to our attention for review and remediation.

- **Training on the new software tool:** We will ensure members of our Procurement, Chief Risk Office and Modern Slavery experts within MinterEllison undertake training to optimise our use of the new software tool to conduct supplier risk assessments. This will bolster capability to conduct Modern Slavery risks assessments and enable ongoing development of knowledge and understanding of Modern Slavery risks;
- **Questionnaire simplification:** We will simplify our Modern Slavery Questionnaires based on Modern Slavery risks, our procurement spend and our supplier profiles using a due diligence software tool which will be used to undertake rapid searches to assess risks on our suppliers, including small suppliers;
- **Supplier compliance:** We will continue to require our suppliers to adhere to our Procurement Compliance Standards or equivalent standards. We will also review and enhance the material available on our website for our suppliers and direct our suppliers to receive additional training and accreditation;
- **Ongoing supplier monitoring:** We will review and augment our processes for continuous monitoring of suppliers and their supply chains, with a keen focus on high-risk sources, including reassessing our ICT supplier due diligence in high-risk regions post- integration;
- **Awareness of grievance mechanisms:** We will work on raising awareness of our grievance mechanisms among our

people and promote our email channels for reporting concerns by suppliers and their workers on our website to report concerns and provide feedback;

- **Methodology enhancement:** We will work to improve our risk assessment methodology to ensure it remains effective and aligned with industry standards and global trends and research;
- **Stakeholder engagement and collaboration:** We will continue to engage and collaborate with relevant external stakeholders, experts and other law firms to share good practice;
- **Policy updates:** We will review and where necessary, update our Modern Slavery related policies;
- **Response and remediation plan review:** Following the implementation of the supplier due diligence software tool we will agree on the next phase of our response and remediation plan; and
- **Process review and refinement:** Our Modern Slavery risk processes will be regularly reviewed and refined to maintain a robust continuous improvement strategy that adapts to changing conditions.

We are committed to reducing the risk of Modern Slavery in our operation and supply chain and believe these actions will position us to make meaningful progress in the upcoming reporting periods.

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 28 November 2024. 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 3 December 2024.



Andrew Rentoul

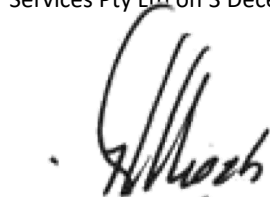
Chairman of the Partnership Board of MinterEllison



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 3 December 2024. This Statement is signed by Peter Coats in his role as director of MinterEllison Services Pty Ltd on 3 December 2024.



Peter Coats

Chairman of the Board of MinterEllison Services Pty Ltd

Mandatory criteria

This Statement has been prepared to meet the mandatory criteria for a Modern Slavery statement outlined in section 16 of the Modern Slavery Act. The below table identifies where each criterion is addressed in this Statement.

Criteria		Page Number
Criterion 1	Identify the reporting entity.	1
Criterion 2	Describe the structure, operations and supply chains of the reporting entity.	4
Criterion 3	Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	6-11
Criterion 4	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.	13-15
Criterion 5	Describe how the reporting entity assesses the effectiveness of such actions.	16
Criterion 6	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).	17
Criterion 7	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	18