

# Modern Slavery Statement FY25

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). It covers affiliated entities and other businesses we own or control and businesses we operate, including 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 2024 to 30 June 2025. It was approved by the MinterEllison Partnership Board on 27 November 2025 and the Minter Ellison Services Pty Ltd Board on 28 November 2025.

# Contents

MinterEllison's Purpose and Values	3
Our structure and operations	4
Our supply chain	5
Identifying the risks of Modern Slavery in our operations and supply chain	6
Actions taken to assess and address Modern Slavery risks	7
Case Study 1 – Employee Benefits	10
Case Study 2 – Facilities Management	11
Our approach to Modern Slavery risk assessment and mitigation	16
Summary of our Actions	17
Assessing the effectiveness of our actions to address Modern Slavery risks in FY25	18
Future initiatives - FY26 and beyond	19
Consultation	20
Statement approval	22
Mandatory criteria	23



## MinterEllison's Purpose and Values

We are an Australian legal and consulting business and our purpose is to create sustainable value with our clients, our people and our communities. Our values include excellence, curiosity and innovation to help solve complex challenges for our clients and our business and guide our approach to responsible business.

We are committed to fostering an inclusive, sustainable workplace and believe our environmental, social, and governance (**ESG**) framework sets the foundation for responsible business practices in both our operations and supply chain. Accountability and transparency are central to our approach to governance, reflecting 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 business.

With a strong commitment to continuous improvement and a preparedness to undertake the work necessary to minimise the risks 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 led by Chief Executive Officer and Managing Partner, Virginia Briggs supported by the Executive Leadership Team and overseen by the Partnership Board chaired by Andrew Rentoul.

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.

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

Our consulting services are delivered by the MinterEllison

Consulting Partnership (ABN 50 017 469 292) and MinterEllison Advisory Partnership (ABN 27 632 804 465) through MinterEllison Consulting Pty Ltd, covering technology, cyber security, risk and regulatory, ESG, Education and Legal Optimisation.

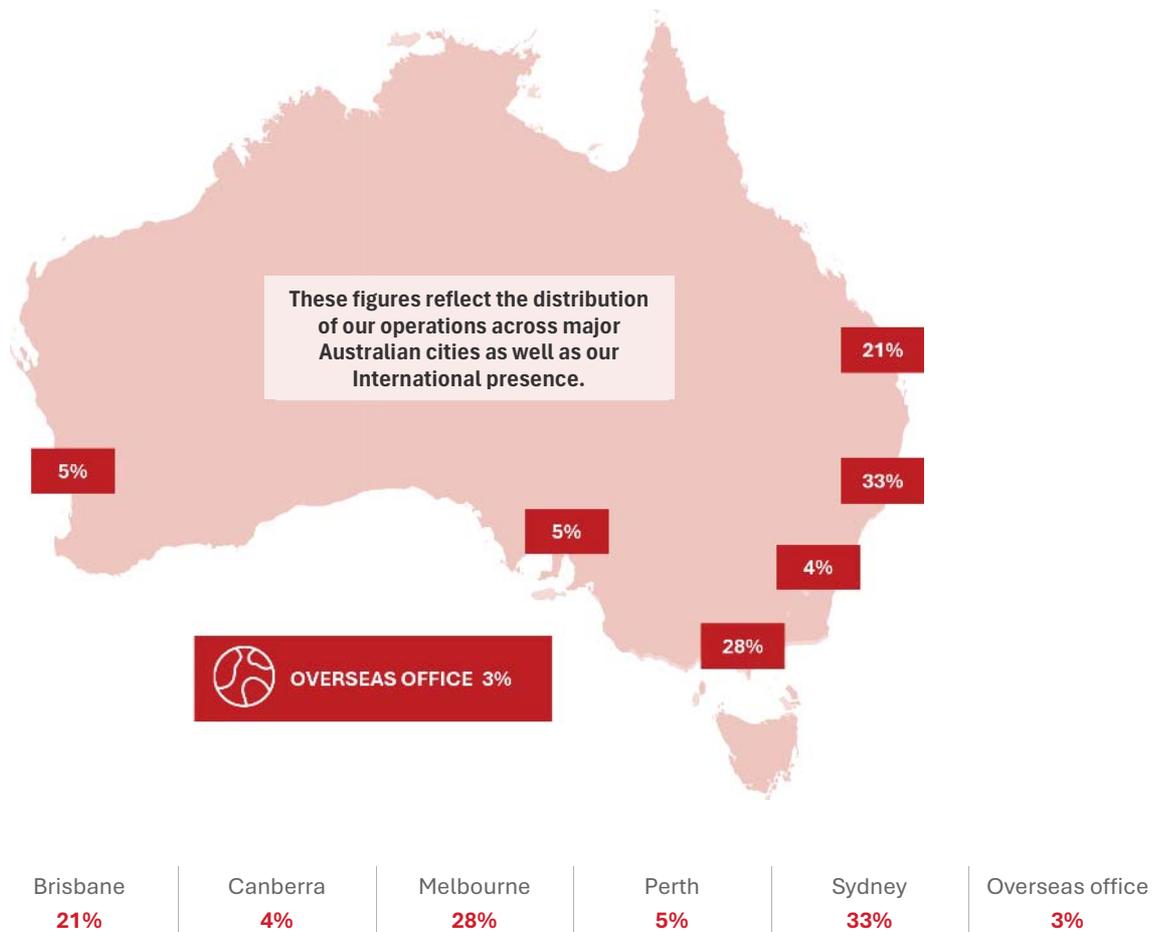
(All entities referred to in this Statement will be collectively referred to as **MinterEllison**).

MinterEllison directly employs over 2,600 people in Australia working in Adelaide, Brisbane, Canberra, Melbourne, Perth, and Sydney. We have a small office in London, MinterEllison (UK) which is an English partnership regulated by the Solicitors Regulation Authority (Reg No

59338). MinterEllison also works with network firms MinterEllison LLP (Hong Kong) and MinterEllison RuddWatts (New Zealand). We are not financially integrated with these network operations.

MinterEllison's organisational structure includes offices in major Australian capital cities and a London office, which enables us to deliver high-quality, tailored Australian legal and consulting services. While our primary operations are in Australia, our reach extends internationally through strategic relationships with select firms, allowing us to support clients wherever their business takes them.

### Distribution of workforce by location as at 30 June 2025



## Our supply chain

We procure goods and services to conduct our operations from suppliers primarily located in Australia though we do also have a number of overseas suppliers.

Key procurement categories include:

- **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 the risks of Modern Slavery in our operations and supply chain

Modern Slavery is a global issue which requires a co-ordinated response from governments, businesses and communities alike. Our Modern Slavery response is informed by key international and domestic frameworks, including:

- The Commonwealth *Modern Slavery Act 2018* – Guidance for Reporting Entities developed by the Federal Government
- 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
- 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 recognise that Modern Slavery includes a range of serious exploitative practices, including human trafficking, debt bondage, forced labour, and child labour. While poor labour practices such as underpayment or unsafe working conditions may not meet the legal definition of Modern Slavery, they are recognised as high-risk factors that can contribute to its emergence over time.

Modern Slavery can occur in any industry and at any point in the supply chain. It is often hidden and difficult to detect, particularly in complex or opaque supply chains.

According to the Australian Council of Superannuation Investors' Research Report *'Modern Slavery Risks, Rights and Responsibilities'*<sup>1</sup> high-risk industries in our business sector include:

- IT procurement
- Logistics
- Property and building services (e.g. facilities management, utilities, cleaning, waste management, security)
- Print and promotional goods

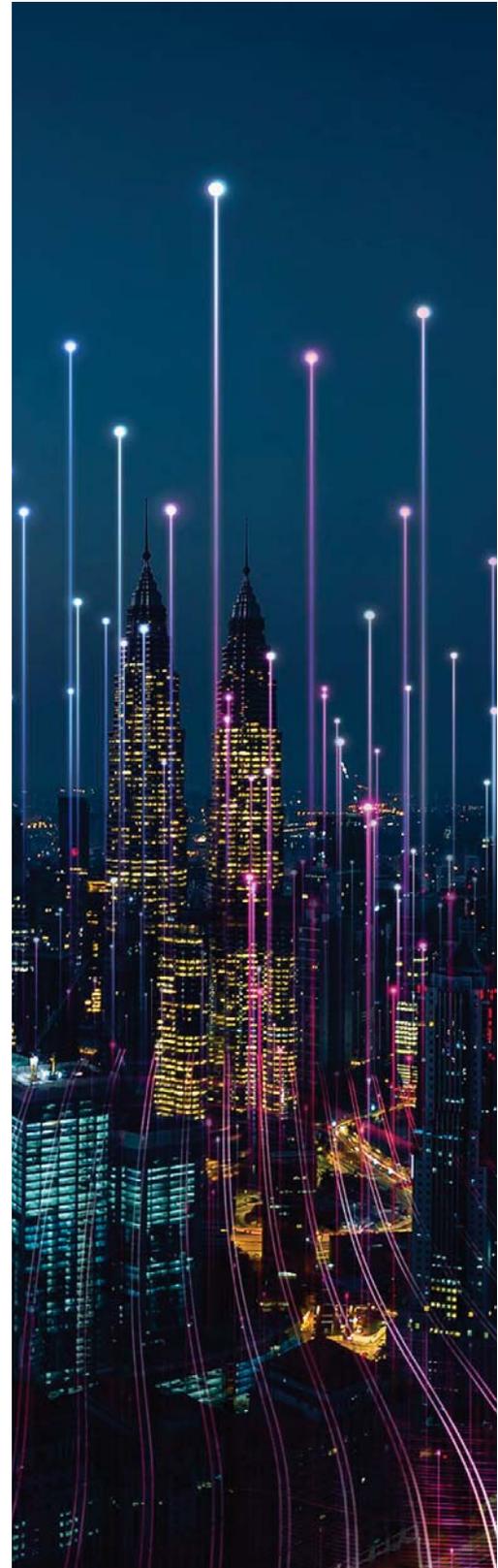
Geographies with heightened risk include:

- Conflict-affected regions
- Countries with weak rule of law or high levels of corruption
- Nations with large migrant workforces and widespread use of third-party employment agencies

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:

- Reliance on low-skilled and migrant labour
- Complex subcontracting
- Non-compliance with workplace laws
- Downward price pressures
- Informal subcontracting and sham contracting
- Low-margin products and services involving hazardous or unregulated manufacturing processes

- Poor governance, conflict, or socio-economic instability



<sup>1</sup> [ACSI-Modern-Slavery-Report.Feb19.pdf](#)



# Actions taken to assess and address Modern Slavery risks



## Approach to risk assessment

We apply a risk-based methodology to assess Modern Slavery risks in our operations and supply chain. This methodology considers a range of factors, including geographic location, industry sector, product and service types, and business models. Our focus is on identifying and mitigating material risks that could impact our organisation.

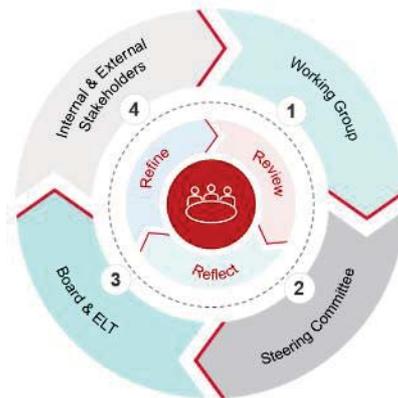
To support this approach, we established and maintain a Modern Slavery Working Group. The Working Group includes representatives from Risk, Procurement, ICT, and other Business Operations teams, as well as specialists from client practice groups with deep knowledge of our firm's supply chain. The group is responsible for implementing our Modern Slavery Action Plan, under the oversight of the Modern Slavery Steering Committee.

The Steering Committee reports to the MinterEllison Partnership Board and includes senior leaders such as:

- Partners who lead our Modern Slavery risk management practice
- General Counsel
- Chief Operating Officer
- Risk Office
- Chief Community Officer

We also have a Supplier Risk Management Framework (**SRMF**) which was reviewed in the FY25 reporting period. This framework includes our systems, structures, policies, processes, and people involved in

identifying, assessing, managing, and monitoring supplier-related risks. It ensures that any internal or external risk with the potential to materially affect our operations, financial performance, legal compliance, reputation, or strategic objectives is appropriately managed.



## Operations

As part of our broader risk-based approach to Modern Slavery, we also assess the risks within our own operations, not just our supply chain. We have established procedures to ensure MinterEllison complies with all relevant employment laws. This includes entering into formal employment contracts with our employees and service agreements with our contractors. Our commitment to a fair and transparent workplace includes compliance with minimum wage standards, particularly for those covered by the *Legal Services Award 2020*, such as clerical and administrative staff, law graduates, and law clerks. We are committed to creating a culture where our people are encouraged to voice their concerns or grievances without fear of retaliation, supported by

clear workplace policies and processes.

Our investigations and risk assessments during the reporting period indicate a **low** risk of our direct operations causing or contributing to Modern Slavery as a legal and consulting business. However, we acknowledge the importance of ongoing monitoring and vigilance to identify any emerging Modern Slavery risks.



## Supply Chain

In FY25, we continued to assess Modern Slavery risks across our supplier base using both quantitative and qualitative methods, building on our risk-based approach. A key enhancement was the introduction of a Modern Slavery third party due diligence platform that provides independently verified ESG ratings and accreditation data. This enables our Procurement team to evaluate Modern Slavery risks and verify suppliers more effectively, complementing our existing processes and improving our ability to identify and respond to risks.

Our evaluation process includes:

- The due diligence platform to identify and verify Modern Slavery and human rights credentials and red flags at the commencement of the procurement process.
- A tailored **Modern Slavery Questionnaire**, with a simplified version for small suppliers designed to capture supplier specific risk indicators which has a risk



scoring system that considers key risk indicators like:

- Country of origin and operational footprint
- Subcontracting arrangements
- Workforce composition
- Existence of Modern Slavery policies and certifications
- Transparency and traceability of supply chains, the lack of a Modern Slavery

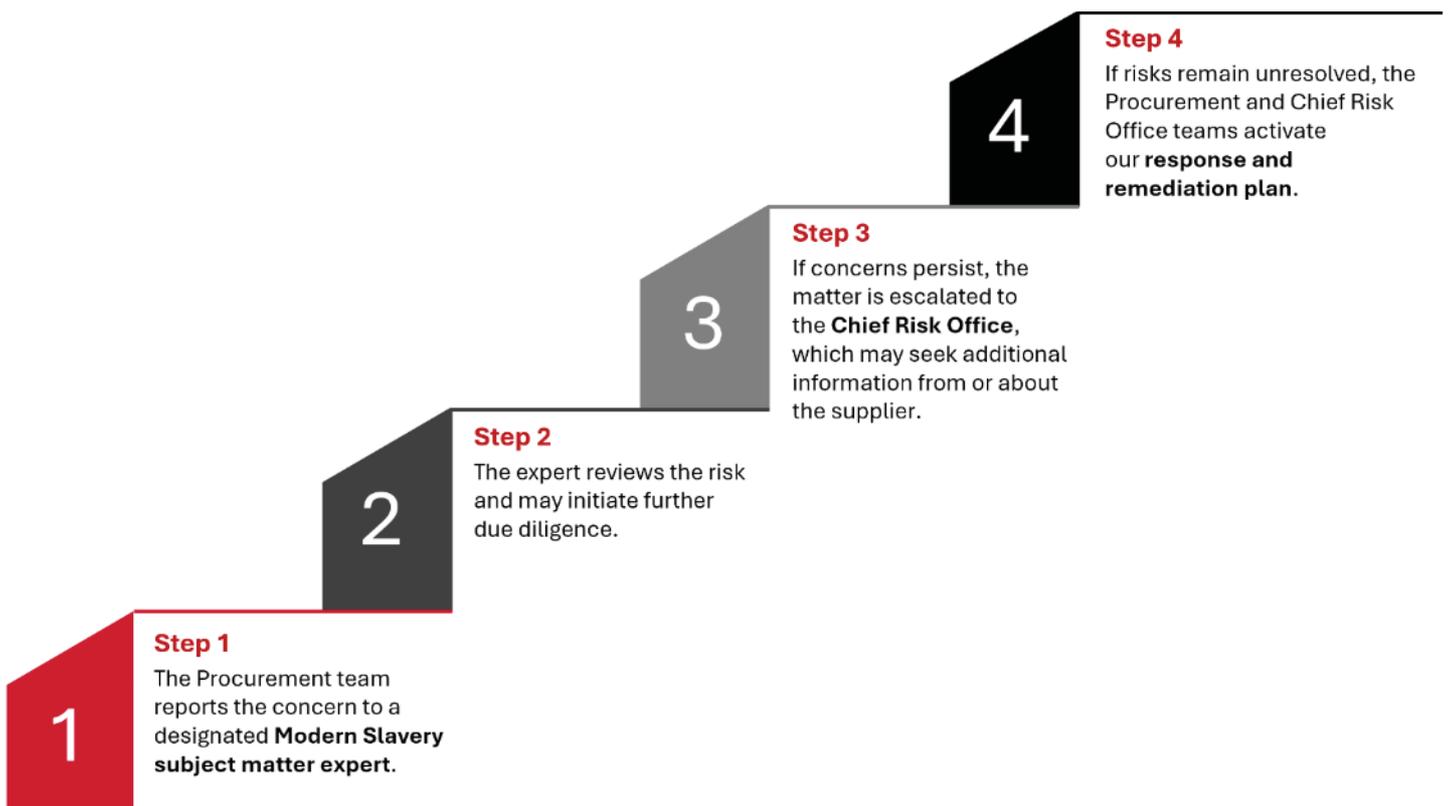
Statement, human rights related policies, and procedures

When necessary, our team reviews the risk scores in detail and determines if further investigation or action is needed.

- Where suppliers decline to complete our questionnaire, we conduct a **qualitative analysis** of their human rights related policies and Modern Slavery Statements through publicly available data (e.g. supplier websites), where

necessary, and make an assessment as to whether or not this supplier can be considered for procurement going forward.

To ensure timely action if medium or high Modern Slavery risks are identified during our assessments, we have established an escalation process to ensure any Modern Slavery risks are addressed. If a potential Modern Slavery risk is flagged the following steps are implemented:





### Sector specific risk management (ICT Suppliers)

As part of our broader supplier risk assessment program, we monitor Modern Slavery risks related to forced labour in the Information and Communications Technology (ICT) sector.

ICT suppliers are assessed using our due diligence platform. Where required, we also apply our Modern Slavery Questionnaire and follow the established escalation process. We recognise the sector presents unique challenges due to limited transparency in supply chains, especially in the sourcing of raw materials, manufacturing of hardware components, and disposal processes, which are often linked to exploitative labour practices.

Several of our ICT suppliers are headquartered in or operate through subcontractors in countries identified by the *Walk Free Foundation's Global Slavery Index*<sup>2</sup> as having a higher prevalence of Modern Slavery, including India and the Philippines.

That said, the application of our risk assessment methodology for the FY25 reporting period did not yield any medium or high-risk ratings for these suppliers.

Nonetheless, we acknowledge that the risk of being directly linked to Modern Slavery remains elevated where suppliers operate in, or source from, high-risk geographies or industries. We remain committed to refining our due diligence processes and enhancing supplier engagement to mitigate these risks.



### Sector specific risk management (non-ICT Suppliers)

In FY25, we continued to apply our risk-based assessment methodology to non-ICT suppliers, using the same indicators and processes applied to ICT suppliers. Where risks were identified, we followed the same escalation process used for ICT suppliers, beginning with internal review by our Modern Slavery subject matter experts and, if necessary, escalation to the for further investigation and remediation planning.

During the reporting period, several non-ICT suppliers were initially assessed as medium or high risk. This was typically due to:

- Lack of measurable Modern Slavery credentials
- Incomplete or incorrect questionnaire responses
- Operations in high-risk geographies or industries

In each case, upon further review of their operations, policies, and publicly available data, we concluded that the actual risk of Modern Slavery was low. As a result, we continue to assess the overall risk of MinterEllison causing or contributing to Modern Slavery through the procurement of non-ICT goods and services as low.

Nonetheless, we acknowledge that the risk of being directly linked to Modern Slavery is higher where suppliers are based in, source or manufacture products, or use labour from countries with a higher prevalence of Modern Slavery.

We recognise that certain non-ICT procurement categories carry a higher inherent risk of Modern Slavery. These include:

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

To further illustrate our risk management approach, we have included two case studies related to the procurement of non-ICT goods:

<sup>2</sup> [Global Slavery Index | Walk Free](#)



# Case Study 1 – Employee Benefits

## Employee Benefits

We conducted an internal modern slavery review of our employee benefits program focussed on our 30 employee benefits suppliers.



### INVESTIGATION:

The catalyst for this audit was the consideration of onboarding a potential new employee benefits supplier which would provide discounted suits to our employees sourced from China. Our standard due diligence process could not verify any modern slavery credentials for this manufacturer, prompting further scrutiny. To address this gap, we required the manufacturer to complete our tailored Modern Slavery Questionnaire, ensuring compliance with international human rights standards and ethical manufacturing practices. We asked the supplier to provide us with evidence that its manufacturers in China held certain quality and human rights certifications such as WRAP, GOTS, and BSCI. Ultimately the decision was made not to onboard this supplier.



#### FINDINGS

A significant challenge uncovered during the investigation was the lack of transparency in the supplier's supply chain. The supplier did not respond to our questionnaire to provide more information about their manufacturer's certifications. This lack of transparency raised serious concerns.



#### OUTCOME

Given the absence of credible evidence from the suit supplier we decided not to onboard the potential supplier to our employee benefits program. Our findings highlighted the need for a more rigorous vetting process of our employee benefits suppliers and underscored the importance of transparency and accountability in supply chains.



#### RE-EVALUATION PROCESS

We investigated the modern slavery accreditations of all our 30 employee benefits suppliers using our existing tools. This was done to ensure that all links in the supply chain adhered to our ethical standards and to identify any potential risks relating to Modern Slavery.



#### FURTHER FINDINGS

Encouragingly, the re-evaluation process yielded positive results. All other suppliers, apart from the non-responsive suit manufacturer, either possessed modern slavery credentials or completed our questionnaires satisfactorily, with assessments revealing low risk scores. This reaffirmed their commitment to ethical practices and their alignment with our organisation's values.



#### STRATEGIC IMPORTANCE

This investigation was a crucial part of our broader strategy to manage Modern Slavery risks in our operations. By taking a proactive approach and not merely relying on the assurances of suppliers, we set a precedent for due diligence that reinforces our ethical commitments.



#### ONGOING INITIATIVES

Considering the findings and to bolster our efforts, we have strengthened our vetting protocols for all employee benefits suppliers. The investigation served as a 'wake-up call' to the prevalent risks of Modern Slavery in supply chains, particularly in regions where transparency is not mandated.



# Case Study 2 – Facilities Management

## Facilities Management in MinterEllison's offices

The 2023 Global Slavery Index estimated that on any given day in 2021, there were 41,000 individuals living in modern slavery in Australia. This figure suggests that for every thousand individuals in the country, around 1.6 were living in modern slavery. Despite being a significant issue within society, modern slavery often remains concealed, with statistics indicating that 80% of these victims remain unnoticed in Australia. These findings are reported by sources including Walk Free and the Australian Government's Attorney-General's Department.<sup>3,4</sup>

As a leading professional services firm, MinterEllison is dedicated to upholding responsible and ethical business practices. We are committed to doing all we can to minimise all and any forms of exploitation in our operations.



### INVESTIGATION:

We set out to conduct a comprehensive assessment of the risks associated with Modern Slavery within our organisation's facilities management services across our offices in Australia, specifically in Perth, Melbourne, Sydney, Brisbane, Adelaide, and Canberra. By identifying areas of potential concern and outlining strategies to mitigate these risks, we strive to protect vulnerable workers and maintain the highest standards of integrity and responsibility in our supply chain.



#### HIGH-RISK SERVICES IDENTIFICATION

We identified the following facilities management services as high-risk of Modern Slavery practices - general cleaning, waste management, carpet cleaning, and security services. This sector and these services are particularly vulnerable for the following reasons.



#### RELIANCE ON LOW-SKILLED LABOUR

These services often depend on low-skilled workers who may have limited employment opportunities and lack alternative income sources. For example, general cleaning services frequently employ migrant workers who might not be aware of their rights and are at risk of exploitation.



#### COMPLEX SUBCONTRACTING CHAINS

Accountability and oversight can be obscured by complex subcontracting arrangements. For instance, a security service provider might subcontract to smaller firms, making it difficult to ensure compliance with ethical standards.



#### NON-COMPLIANCE WITH WORKPLACE LAWS

There is a prevalence of non-compliance with workplace laws in the facilities management sector. A predominantly migrant workforce with limited English proficiency and understanding of Australian workplace laws is particularly vulnerable. For example, such workers might be unaware of their rights to fair wages and safe working conditions.



#### DOWNWARD PRICE PRESSURES

Significant downward price pressures exerted by first tier suppliers can lead to cost-cutting measures that compromise workers' rights. For example, carpet cleaning companies might reduce wages or increase workloads to meet the low prices demanded by their clients.



#### INFORMAL SUBCONTRACTING AND SHAM CONTRACTING

Low barriers to entry for labour hire providers lead to a proliferation of subcontracting and sham contracting arrangements. Workers might be incorrectly classified as independent contractors rather than employees, stripping them of employment-related protections such as minimum wages and paid leave. For instance, a cleaning company might hire workers as independent contractors to avoid providing employee benefits and job security.

<sup>3</sup> [Modern slavery in Australia | Walk Free](#)

<sup>4</sup> Australian Government- Attorney General's Department Modern Slavery Key Facts and Figures



## Supplier risk assessment

We compiled a list of landlords and their primary suppliers for the specified facilities management services. Our investigations involved several key steps:

- (a) **Review of supplier accreditation and policies:** We used a third-party software tool to identify supplier accreditations and ESG (Environmental, Social, and Governance) ratings. Particular attention was given to certifications like the Cleaning Accountability Framework and other relevant building supply chain accreditations.
- (b) **Qualitative review of Modern Slavery Statements:** We examined the suppliers' modern slavery statements to determine if they were adequately identifying, addressing, and responding to Modern Slavery risks. Critical areas of review included:
  - Modern Slavery or ESG accreditations and risk ratings for the supplier.
  - Worker education and training on their rights and workplace standards.
  - Remuneration of workers at or above award wage levels.
  - Access to procedures for reporting exploitation or other grievances.
  - Regular audits, assessments, and site visits to ensure compliance with ethical standards and legal requirements.
  - Existence of human rights policies, codes of conduct, and training programs for employees.
- (c) **Qualitative review of suppliers' websites:** We also reviewed the suppliers' websites to check for external human rights and modern slavery prevention policies.

These steps helped us complete a risk assessment of each supplier's risk profile and understand the risks of Modern Slavery within our supply chain and ensure that our suppliers are committed to ethical practices.

## Findings

Our investigations revealed that, with the exception of the Canberra and Perth offices, and a waste management supplier in Sydney, all of our first-tier and second-tier suppliers had obtained modern slavery accreditations and demonstrated active management of their Modern Slavery risks.

## Next steps

To address the gaps in data for the Canberra and Perth offices, and the Sydney waste management supplier, we undertook the following actions:

<b>Engage with Suppliers</b>	Sent out detailed questionnaires to those suppliers in Canberra and Perth and Sydney where we had been unable to obtain any verified information about their Modern Slavery risk management practices.	<b>Collaborate with Landlords</b>	Worked with landlords to address gaps and share search results and findings to resolve information shortcomings.
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## Results of further enquiries

The suppliers provided us with satisfactory information about their organisation's Modern Slavery risk management and policies. This collaborative approach closed the identified information gaps.

## Conclusion and recommendations

This case study underscores the critical importance of due diligence in managing Modern Slavery risks within the facilities management supply chain. While most of our suppliers have demonstrated competency in obtaining modern slavery accreditations and actively managing their risks, there were information gaps in the Canberra and Perth offices that required further due diligence which was satisfactorily completed. By proactively reaching out and facilitating meaningful dialogue with both suppliers and landlords, we gained deeper insights into the practices of our key suppliers.

We will continue to monitor our suppliers to verify compliance with ethical standards and legal requirements. By maintaining open communication channels with our suppliers and collaborating closely with landlords, we can promptly address any Modern Slavery related issues that arise.





## Small suppliers

To help small suppliers which may lack resources to understand Modern Slavery risks, we developed an easy-to-understand short form questionnaire. We have been sending short form questionnaires to small suppliers during FY25 and have received positive feedback.



## MinterEllison policies

Our assessment of the risks 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:

### 1. Anti-Bribery and Anti-Corruption

Consistent with our culture of trust, integrity and fairness, this policy outlines a zero tolerance for bribery and corruption. This policy is to ensure our people are aware of and comply with all applicable anti-bribery and anti-corruption laws consistent with our values.

### 2. Workplace Behaviour and Conduct

This policy applies to all our operations and covers our policies and procedures relating to workplace behaviour, discrimination, harassment, sexual harassment and bullying and is designed to ensure a healthy, safe, and inclusive workplace and is aligned with our

legal obligations and commitment to ethical conduct.

### 3. Professional and Ethical Conduct

We are committed to the highest standards of professional and ethical conduct in all aspects of our business. This policy outlines our expectations from our people regarding professional and ethical conduct.

### 4. Code of Conduct

The Code 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. It outlines the values and behaviours expected of all partners and employees to ensure compliance with applicable laws and to uphold MinterEllison's reputation as a highly ethical and professional legal and consulting business.

### 5. Diversity and Inclusion

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

### 6. 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.

### 7. 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 and Procurement Compliance Standards seek to ensure that the goods and services we purchase through our suppliers:

- deliver value for our business, our clients and our communities;
- comply with all relevant laws and demonstrate ethical business practices; and
- operate consistently with our commitment to conduct ourselves in an ethical and fair manner.

### 8. 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.

### 9. 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.



## 10. 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.



### Effectiveness and Continuous Improvement

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 FY25, we continued our 'Review, Reflect and Refine' project (**Project**) focusing on our Modern Slavery risk assessment methodology, associated software, ancillary documents, and policies. The Project was commissioned by the Modern Slavery Steering Committee, in conjunction with a major Procurement upgrade.

We are in the process of onboarding a new procurement system, expected to be operational in early FY26. This system will allow us to centrally store and manage supplier and contract information, oversee vendor relationships, monitor risk and RAG status, and generate more effective reporting outputs.



### Process Enhancements

In FY25, we undertook a series of enhancements to strengthen our

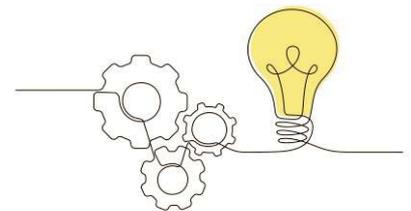
procurement and Modern Slavery risk management processes.

These included:

- **Policy and Standards Review:** We revised our Responsible Procurement Standards to reflect best practice and conducted a review of our Modern Slavery clauses and risk management procedures (an ongoing exercise). Where suppliers resisted our standard terms, matters were escalated to the General Counsel's Office for determination.
- **Online Platform Implementation:** We launched a due diligence platform to automate supplier screening, track credentials, and provide real-time insights into Modern Slavery risks. Key suppliers have now been onboarded, and the platform has significantly improved our ability to monitor risk and supplier compliance.
- **SRMF:** The Risk Office implemented a firmwide SRMF to assess and manage supplier risks across the full lifecycle. This includes a register of high-risk suppliers and clearly defined roles and responsibilities.
- **Escalation Protocols:** We refined our escalation process to ensure prompt action when medium or high Modern Slavery risks are identified. Concerns are first reviewed by subject matter experts and, if necessary, escalated to the Risk Office for further investigation and remediation.
- **Simplified Supplier Engagement:** We introduced a tailored Questionnaire for large and small suppliers, improving accessibility and understanding. Positive feedback from suppliers

confirmed the effectiveness of this approach.

- **Pre-Tender Risk Assessments:** We embedded Modern Slavery risk assessments into our tender and onboarding processes to promote ethical practices from the outset.
- **Website and Communication Updates:** We updated our [Responsible procurement and Modern Slavery](#) webpage, maintained a dedicated SharePoint site, and extended whistleblowing contact points to include both Procurement and the Risk Office.
- **Commitment to Continuous Improvement:** The introduction of our new due diligence platform which we used to re-evaluate 30 employee benefits suppliers and follow-up with facilities management service providers in Canberra and Perth demonstrated our commitment to ongoing improvement and accountability.





## Training and Education of our people

To support our risk assessment processes and strengthen our organisational response to Modern Slavery, we continue to invest in training and education across the firm.

In FY25, members of our Procurement team and other relevant staff participated in a range of training initiatives, including:

- Hands-on training in the use of our new due diligence platform
- Modern slavery webinars hosted by the Australian Legal Sector Alliance (**AusLSA**) and the Responsible Business Forum comprising a group of large and medium law firms
- Industry roundtables focused on emerging risks and best practice approaches

These initiatives are designed to deepen understanding of the indicators and risks associated with Modern Slavery and ensure that this knowledge is applied effectively in our operations.

To reinforce our firmwide educational focus, our **Chief Community Officer** led the development and ongoing maintenance of several resources:

- A learning session featuring a panel discussion with an expert from the Human Rights Law Centre and a MinterEllison Partner specialising in Modern Slavery risks and reporting. This session was recorded and made available to all staff via our Modern Slavery and Procurement SharePoint site.

- A dedicated **Modern Slavery SharePoint page**, created to centralise internal information, facilitate communication, and host training materials, articles, research, and useful links.
- An external **Responsible Business webpage**, publicly accessible, which outlines our commitment to ethical practices. It includes direct links to our Responsible Procurement webpage and details our Procurement Compliance Standards.



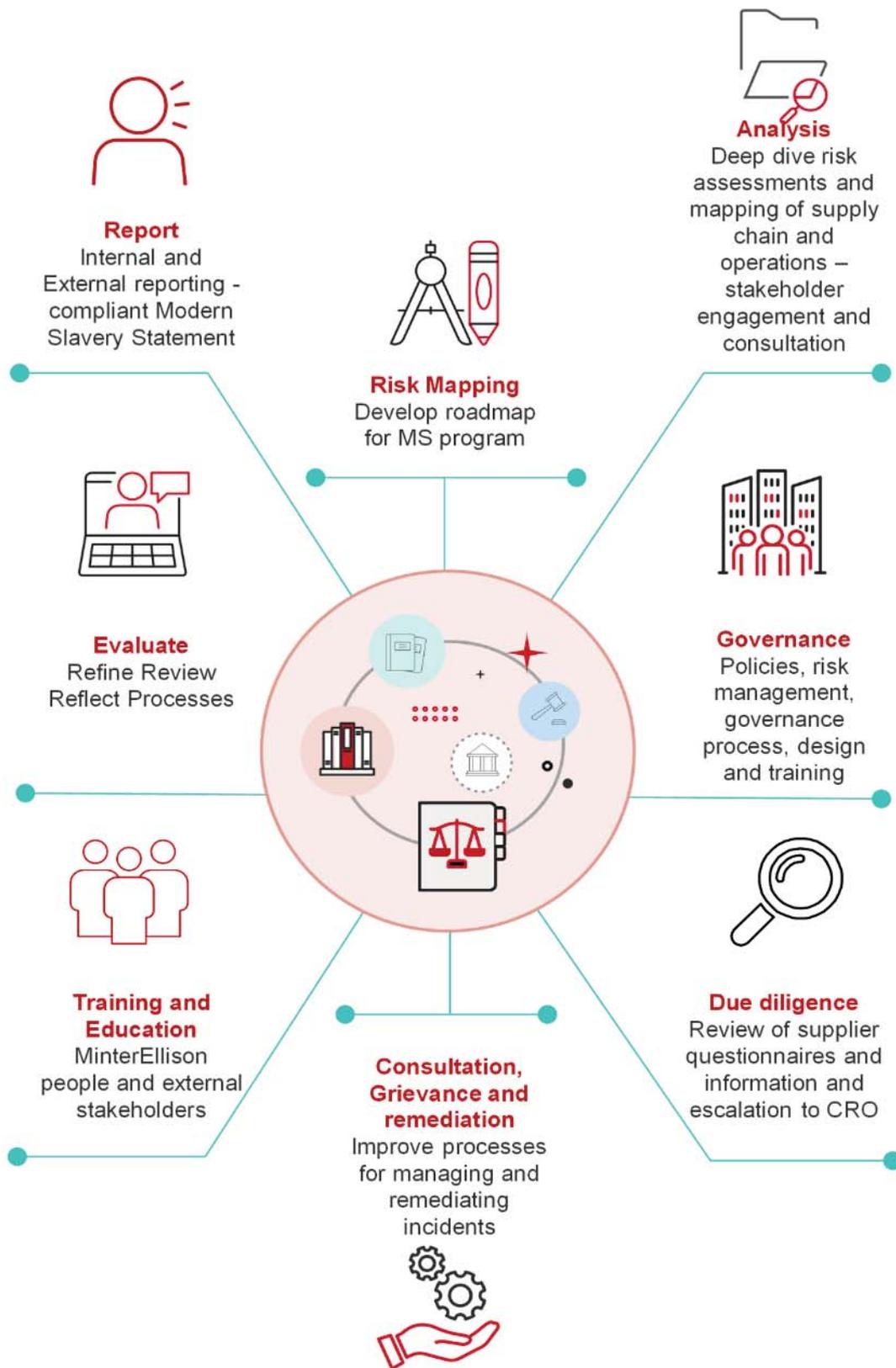
## Speak Up Portal and Grievance Mechanisms

We strengthened our culture of transparency through the following:

- **Speak Up Portal:** A confidential reporting channel for concerns related to workplace behaviour, misconduct, or Modern Slavery.
- **Surveys:** Our people surveys now include questions about confidence in reporting and voicing concerns, helping us assess trust and identify areas for improvement.
- **Supplier Reporting Channels:** Suppliers can report concerns via dedicated email addresses for Procurement and the Risk Office, both listed on our Responsible Business webpage and our Procurement Compliance Standards.



# Our approach to Modern Slavery risk assessment and mitigation



## Summary of our Actions

In the FY25 reporting period, we focused on implementing the future actions proposed in our FY24 Modern Slavery Statement. Key achievements included:

FY24 PROPOSED ACTION	FY25 ACTIVITY
<p><b>Continue reviewing and refining our risk assessment process of suppliers to better identify risk and strengthen our supplier engagement around Modern Slavery</b></p>	<p>Our focus in FY25 was to implement an automated supplier risk screening and due diligence platform that provides verified and independent third-party data about our suppliers. This software provides automatic screening and tracking of supplier credential to address Modern Slavery risks.</p>
<p><b>Improve our supplier data capture processes for our procurement activities within MinterEllison to continuously improve our operations and supply chain risk assessment processes.</b></p>	<p>The implementation of our new due diligence platform has enabled us to improve our data capture and analysis of potential suppliers. We have assessed our top 500 suppliers with expansion planned for FY26.</p>
<p><b>Review premises procurement practices</b></p>	<p>Conducted targeted screening in FY25, using the new due diligence platform in premises related services (including cleaning, security, waste management and recycling contracts) within their supply chains. See Case Study 2 – Facilities Management. We will also continue screening for broader premises procurement, including planned office relocations in FY25 and FY27.</p>
<p><b>Expand enterprise-wide training</b></p>	<p>Delivered HRLC-led sessions, webinars, and maintained SharePoint resources</p>
<p><b>Support small suppliers</b></p>	<p>Introduced simplified Modern Slavery Questionnaire</p>
<p><b>Raise awareness of grievance mechanisms</b></p>	<p>Promoted Speak Up portal and supplier contact points</p>
<p><b>Collaborate with external stakeholders</b></p>	<p>Participated in AusLSA and law firm roundtables on responsible procurement</p>
<p><b>Monitor legislative developments</b></p>	<p>Delivered internal training on Commonwealth Government’s review of the Modern Slavery Act</p>
<p><b>Develop remediation plan</b></p>	<p>Updated response and remediation plan; integrated with new risk escalation processes</p>



## Assessing the effectiveness of our actions to address Modern Slavery risks in FY25

Throughout FY25, our Modern Slavery Working Group and Steering Committee played a central role in evaluating the effectiveness of our actions to identify and address Modern Slavery risks. Meeting quarterly, these groups provided oversight, shared insights, and guided continuous improvement across our procurement and risk management processes.

### Key evaluation outcomes

- **Deployment of due diligence platform**

We successfully implemented a third-party due diligence platform, which enabled us to assess both potential and existing suppliers using verified data. This significantly reduced reliance on subjective assessments and improved the consistency and accuracy of our risk ratings.

- **Methodology refinement and feedback loop**

The Steering Committee received regular progress reports and used insights from supplier assessments and internal reviews to refine our risk assessment methodology. This included integrating more quantitative metrics and updating escalation protocols.

- **Monitoring action plan progress**

The Working Group tracked progress against our FY25 Modern Slavery Action Plan, ensuring that each initiative, such as supplier re-evaluation, training, and grievance mechanism promotion was implemented and reviewed for impact.

- **Regulatory and industry intelligence**

Emerging policy and other developments in connection with the review of the Modern Slavery Act and industry best practices were regularly discussed and incorporated into our processes. This ensured our approach remained aligned with evolving expectations and legal obligations.

- **Executive engagement and oversight**

The Executive Leadership Team and the MinterEllison Partnership Board were kept informed of key developments, risk trends, and strategic decisions. Their engagement reinforced accountability and elevated the visibility of Modern Slavery risk management across the firm.

- **Enhanced supplier insights**

Through our due diligence platform, questionnaire responses, and targeted engagement, we gained deeper insights into supplier practices, particularly in high-risk sectors. This enabled more informed decision-making and proactive risk mitigation.

- **Formalisation of procurement processes**

We continued to centralise and formalise our procurement processes, including the development of a SRMF. This framework supports consistent risk evaluation across the supplier lifecycle.

- **Escalation protocol improvements**

Our internal escalation process was refined to ensure that any identified Modern Slavery risks were promptly reviewed by subject matter experts and, where necessary, escalated to the Risk Office for further investigation and remediation.

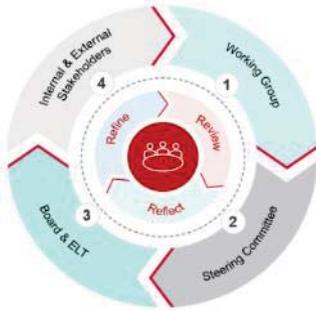
- **Impact assessment**

These improvements have significantly strengthened our ability to engage with suppliers, assess risk using objective data, and respond to potential Modern Slavery concerns. The integration of automated tools and structured governance has enhanced transparency, reduced manual effort, and improved the timeliness of our interventions.

Importantly, no instances of Modern Slavery were identified or reported through our due diligence processes during the FY25 reporting period. While this outcome reflects the effectiveness of our current controls, we remain cautious and committed to ongoing vigilance, recognising that Modern Slavery risks can be hidden and evolve over time.



## Future initiatives - FY26 and beyond



Building on the insights gained through our *Review, Reflect, Refine* approach, we are committed to continuously improving our Modern Slavery risk management practices. In future reporting periods, we plan to take the following actions to further reduce the risks of Modern Slavery in our operations and supply chain:

### 1. Strengthening governance and monitoring changes

- Continue monitoring the Federal Government’s response to the review of the Modern Slavery Act.
- Review and update firm policies and procedures to reflect legislative and policy changes and emerging risk priorities.

### 2. Enhancing procurement and supplier oversight

- We will reflect on our FY25 case study to review our premises procurement processes and continue to engage with the relevant people, as we scale up the implementation of our new due diligence platform and our new procurement system. We will maintain our focus on engagement with our landlords on cleaning, security, waste management and recycling contracts to manage Modern Slavery risks.
- Supplier compliance: Reinforce adherence to our Procurement

Compliance Standards and enhance supplier-facing resources and training.

- Supplier due diligence process: Develop clear triggers and monitoring schedules for key suppliers post-onboarding of our new procurement system.

### 3. Firm-wide training and capacity building

We will continue delivering 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.

### 4. Implement the next phase of our due diligence platform alongside a new Procurement System

We will continue to improve data analytics on our suppliers and reporting and review the platform’s effectiveness in:

- Streamlining due diligence and reducing manual error
- Enabling periodic supplier monitoring and risk detection
- Supporting targeted risk assessments and prioritisation
- Generating actionable insights and red flags
- Enhancing ESG reporting capabilities
- Providing learning modules for suppliers lacking credentials
- Ensuring quarterly data refreshes and alerts of

certification lapses and trend analysis

### 5. Simplifying supplier engagement

We will monitor our Modern Slavery Questionnaires to ensure that we continue to identify potential Modern Slavery risks associated with our procurement spend and assess our supplier profiles using our new due diligence platform to undertake rapid searches to assess risks, continue to monitor, vet and screen our suppliers, including small suppliers.

### 6. Grievance mechanisms’ awareness

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.

### 7. Collaboration

- Continue engaging with external stakeholders, experts, and peer firms to share best practices.
- Finalise the next phase of our response and remediation plan following full implementation of our new systems in FY26.

### 8. 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 remain committed to reducing the risks of Modern Slavery in our operations and supply chain.



## 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 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.

In addition to consulting with Minter Ellison Services Pty Ltd (the other reporting entity for this Statement), MinterEllison consulted with its owned and controlled entities in the development of this Statement. The Steering Committee referred the Statement to the MinterEllison Consulting Partnership, the MinterEllison Advisory Partnership, MinterEllison Consulting Pty Ltd and Minter Ellison Services Pty Ltd for feedback. This enabled open discussion on the reporting requirements under the Modern Slavery Act and about future actions proposed to facilitate continuous improvement.

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





## 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 27 November 2025. 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 2 December 2025.



**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 28 November 2025. This Statement is signed by Peter Coats in his role as director of Minter Ellison Services Pty Ltd on 2 December 2025.



**Peter Coats**

Chairman of the Board  
of Minter Ellison 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
<b>Criterion 1</b>	Identify the reporting entity.	1
<b>Criterion 2</b>	Describe the structure, operations and supply chains of the reporting entity.	4
<b>Criterion 3</b>	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
<b>Criterion 4</b>	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.	7-16
<b>Criterion 5</b>	Describe how the reporting entity assesses the effectiveness of such actions.	18
<b>Criterion 6</b>	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).	20
<b>Criterion 7</b>	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	19



