

MODERN SLAVERY STATEMENT 2022/2023

This statement is made pursuant to sections 13 to 16 of the *Modern Slavery Act 2018 (Cth)* (*Modern Slavery Act*) for the financial year ending 30 June 2023.

This statement is made following consultation with each reporting entity and has been reviewed and approved by the Board of Colin Biggers & Paisley as required by section 16(a) of the *Modern Slavery Act*.

Unless otherwise indicated, all information below is for the reporting period from 1 July 2022 to 30 June 2023 (**Reporting Period**).

The headings below reflect the criteria required by the *Modern Slavery Act*.

REPORTING ENTITY

This Modern Slavery Statement is made on behalf of the following entities for the Reporting Period:

- CBP Lawyers Holdings Limited
- Colin Biggers & Paisley Pty Ltd

The reporting entities are referred to collectively in this statement as “**Colin Biggers & Paisley**” (we / us / our).

During the Reporting Period, we actively engaged and consulted with representatives from all of our reporting entities to identify suppliers, to provide updates on the steps being taken to respond to modern slavery requirements, to receive feedback on action implemented, and to outline planned future action.

The modern slavery risks related to the operation and supply chains of each entity have been identified, addressed and assessed as part of our response.



ABOUT COLIN BIGGERS & PAISLEY

Colin Biggers & Paisley is an Australian legal practice that provides legal services to clients in our chosen markets and fields of expertise. We're particularly known for our insurance, property and construction experience, and have an established reputation in a range of other sectors.

We are proud of our history which dates back to 1900 when Colin Biggers & Paisley was established. Since then, a lot has changed. In 2012, Colin Biggers & Paisley merged with Melbourne-based insurance firm Monahan + Rowell, and in 2013, merged with Brisbane-based firm Hemming + Hart, and in 2021, merged with Melbourne-based firm Logie-Smith Lanyon. Through these mergers and a vision for growth, Colin Biggers & Paisley has expanded to a national legal practice with almost 500 employees and offices on the east coast of Australia.

Our purpose is to work collectively to build and secure the future of our clients, colleagues and community.

For our clients, that means we're invested and we're loyal. To do our best by them, we invest in people with the right combination of legal, business, interpersonal and critical thinking skills, as well as in the right technology to enable them. When it is needed, our close-knit, expertise-based teams collaborate effectively to identify and solve complex issues.

For each other, that means we value our collegiality, we respect and support one another, and we celebrate diverse contributions.

For our communities, that means we take a socially minded approach to provide active support and service where they are needed most. Our determination to be a responsible business led us to establish the Colin Biggers & Paisley Foundation in 2015. The Colin Biggers & Paisley Foundation comprises pro bono legal services, community partnerships including volunteering, charitable contributions and responsible business practices. We focus our efforts in promoting and protecting the rights of women, children and Aboriginal and Torres Strait Islander peoples.

We undertake some of the most pro bono hours of any major Australian law firm and are striving to be leaders in diversity and inclusion. We are proud of the impact our practice has on our clients, the law and the community.

We wholeheartedly support the Modern Slavery Act and its aspirations to eradicate modern slavery, wherever it may occur, and to raise public awareness of the issue.

We are committed to achieving the highest standards of professionalism and ethical behaviour in the conduct of our business and our activities. We support and respect the protection of internationally proclaimed human rights and endeavour to ensure Colin Biggers & Paisley is not complicit in human rights abuses. We are committed to taking steps to ensure that slavery and human trafficking play no part in our own business or our supply chains.

OUR OPERATIONS AND SUPPLY CHAIN

Colin Biggers & Paisley's principal activity is the provision of legal services to our clients. Colin Biggers & Paisley Pty Limited, being the sole entity with employees, employs almost 500 professional staff operating from offices in Sydney, Melbourne, and Brisbane. The major portion of our expenditures is directed towards remuneration. The risk of modern slavery within our operations is minimal, given that we directly employ highly skilled professionals under structured employment agreements.

Our supply chain encompasses goods and services essential for supporting our legal and professional services across three Australian states. No significant alterations have occurred in our supply chain since the reporting period of FY2022. Expenditure in our supply chain is predominantly allocated to infrastructure, facilities, and other supportive elements necessary for facilitating the delivery of our services. The vital components of our supply chain furnish us with:

REAL ESTATE: the offices we work from including leased office space and associated fit out and equipment;

TECHNOLOGY: the IT hardware and software and print services that support our business;

BUSINESS SERVICES: the products we buy for our offices, for example, furniture, stationery and marketing items as well as the services we use in our offices such as catering, security and cleaning;

TRAVEL SERVICES: organising and booking our travel and accommodation requirements;

PROFESSIONAL SERVICES: such as external training services, external consultants and contractors and legal support services; and

LEGAL SERVICE DISBURSEMENTS: as part of our work with clients, we are often responsible for procuring legal services from third parties on behalf of our clients. This includes services from barristers, other law firms, independent consultants and expert witnesses. These are separate from the services we provide directly to our clients and the costs are typically passed through to clients as disbursements.



MODERN SLAVERY RISK ASSESSMENT

During the reporting period, the assessment of modern slavery risks continued to be overseen by our Modern Slavery Working Group (**MSWG**). The MSWG includes representatives from our responsible business team, office services and procurement team, and the risk and compliance team. The MSWG meet regularly to ensure progress in our risk assessment and to discuss and resolve any issues that may arise.

There were no significant changes to our suppliers in the reporting period. As reported on previously, most of our suppliers remain Australian-based, however, we note that many of these suppliers themselves source goods or services from overseas and from locations that may be more at risk of modern slavery. We continue to recognise and undertake a stringent and regular annual review of those suppliers we have identified through our risk matrix as having the greater risks of down-stream supply chain modern slavery.

The MSWG continued to use a risk-based analysis to identify potential areas of modern slavery risk. The process involved assessing the risk of each supplier based on:

- the type of product or service provided and procured;
- the sector of operation;
- the geography of supply;
- the steps taken to understand modern slavery risks within the suppliers own operations; and
- any known supplier-specific issues.

There have been no identified instances of modern slavery and our analysis has found that most tier one suppliers pose a low risk of modern slavery.

The procurement areas that continue to present the greatest risks of modern slavery also provide us with the greatest leverage to drive positive change with our suppliers. These areas have remained consistent with our previous Modern Slavery Statements and include:



IT HARDWARE/ SOFTWARE



OFFICE CLEANING



CATERING, EVENTS AND HOSPITALITY



BRANDED MARKETING PRODUCTS



TRANSPORT AND TRAVEL SERVICES

There have been no identified instances of modern slavery and our analysis has found that most tier one suppliers pose a low risk of modern slavery.



MODERN SLAVERY RISK RESPONSE

The Colin Biggers & Paisley MSWG conducted modern slavery risk assessments throughout the reporting period. Work undertaken included:

- ongoing engagement with new tier one suppliers;
- analysed responses to our supplier questionnaires;
- engaged directly with suppliers who failed to provide a response or whose responses were assessed as inadequate;
- reinforced our internal processes through making refresher Modern Slavery training available online;
- monitored the completion rate and feedback for our training modules on modern slavery;
- conducted follow-up engagement with suppliers, including those identified as high risk due to their operations or down-stream supply chains;
- considered the modern slavery statements of suppliers and prospective suppliers (where available) when making procurement decisions;
- continued engagement with others in the legal services industry to consider industry specific responses to modern slavery risks; and
- continued to make our board and senior management aware of our modern slavery obligations.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Colin Biggers & Paisley recognises the paramount importance of assessing the effectiveness of our initiatives in addressing modern slavery risks in our operations and supply chains. To date, our thorough due diligence and risk assessments of tier one suppliers has not identified evidence of modern slavery. However, we maintain vigilance.

Our commitment extends to an ongoing process of scrutinising and reviewing the efficacy of our actions in identifying, mitigating and addressing modern slavery risks in our operations and supply chain. The MSWG continues to assess the effectiveness of our actions taken to ensure we are in a position to identify and address any modern slavery concerns. Actions taken include:

MSWG is responsible for assessing the effectiveness of actions taken to identify and address modern slavery. The actions taken to date include:

- continuing sustained engagement with our suppliers, with a continued emphasis on smaller suppliers, to enhance their knowledge and comprehension of modern slavery risks;
- identifying the need for information resources for our small suppliers to aid in educating them on modern slavery risk factors, including in the Australian supply chain. Initial resources are targeted for release in the 2024 financial year;
- encouraging greater due diligence participation from our suppliers;

- identifying the need for further internal controls to ensure our internal modern slavery processes are being followed. A redesigned supplier approval process is scheduled for roll-out in the 2024 financial year;
- assessing the number of our suppliers who have adopted human rights or modern slavery commitments, whether by agreeing to our Supplier Code of Conduct or otherwise;
- comparative analysis of responses from high risk supplier responses between the current and preceding periods, with emphasis on identifying changes in their risk profiles;
- monitoring of internal action to further the adoption of modern slavery risk measures throughout our practice and improve our oversight and compliance; and
- identifying the need for changes in our internal procedures to ensure our people are implementing our modern slavery safeguards.

Our methodology, risk assessment and supplier due diligence are subject to ongoing scrutiny by our MSWG.

We continue our focus on identifying how the modern slavery risk measures are being adopted across our practice with a particular focus on the level of engagement and responses we are achieving from our suppliers, our modern slavery training module and ensuring the effective implementation of our policies to combat modern slavery in our supply chains.

CONTINUOUS IMPROVEMENT

Colin Biggers & Paisley's continuous improvement activities include plans to review, monitor and embed our processes by:



Developing further internal controls to ensure compliance with internal modern slavery processes



Developing remediation plans in conjunction with our supplier(s) as and when required



Working with our small suppliers to build their knowledge around modern slavery risks, particularly within Australia



Rolling out modern slavery training more broadly within the practice



Encouraging our suppliers to adopt modern slavery risk programs



Monitoring reporting channels for any reported instances of human rights impacts in our operations and supply chains



Issuing our Modern Slavery Questionnaire beyond tier one suppliers



Reviewing our policies and procedures to reflect changes and developments relating to modern slavery risks and ensuring we are effectively monitoring and assessing any risks in our operations and with our suppliers





CONSULTATION AND APPROVAL

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) and has been reviewed and approved by the principal governing bodies of the following reporting entities:

- CBP Lawyers Holdings Limited on 21 December 2023
- Colin Biggers & Paisley Pty Ltd on 21 December 2023

This statement is signed by Nick Crennan, a responsible member of each of the reporting entities, and Managing Partner of Colin Biggers & Paisley Lawyers.



NICK CRENNAN
Managing Partner
Colin Biggers & Paisley

ANNEXURE A MANDATORY CRITERIA

SECTION 16 MANDATORY CRITERIA	REPORT PAGE NUMBER/S
Identify the reporting entity.	2
Describe the reporting entity's structure, operations and supply chains.	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.	5
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	6
Describe how the reporting entity assesses the effectiveness of these actions.	6
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	2



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