



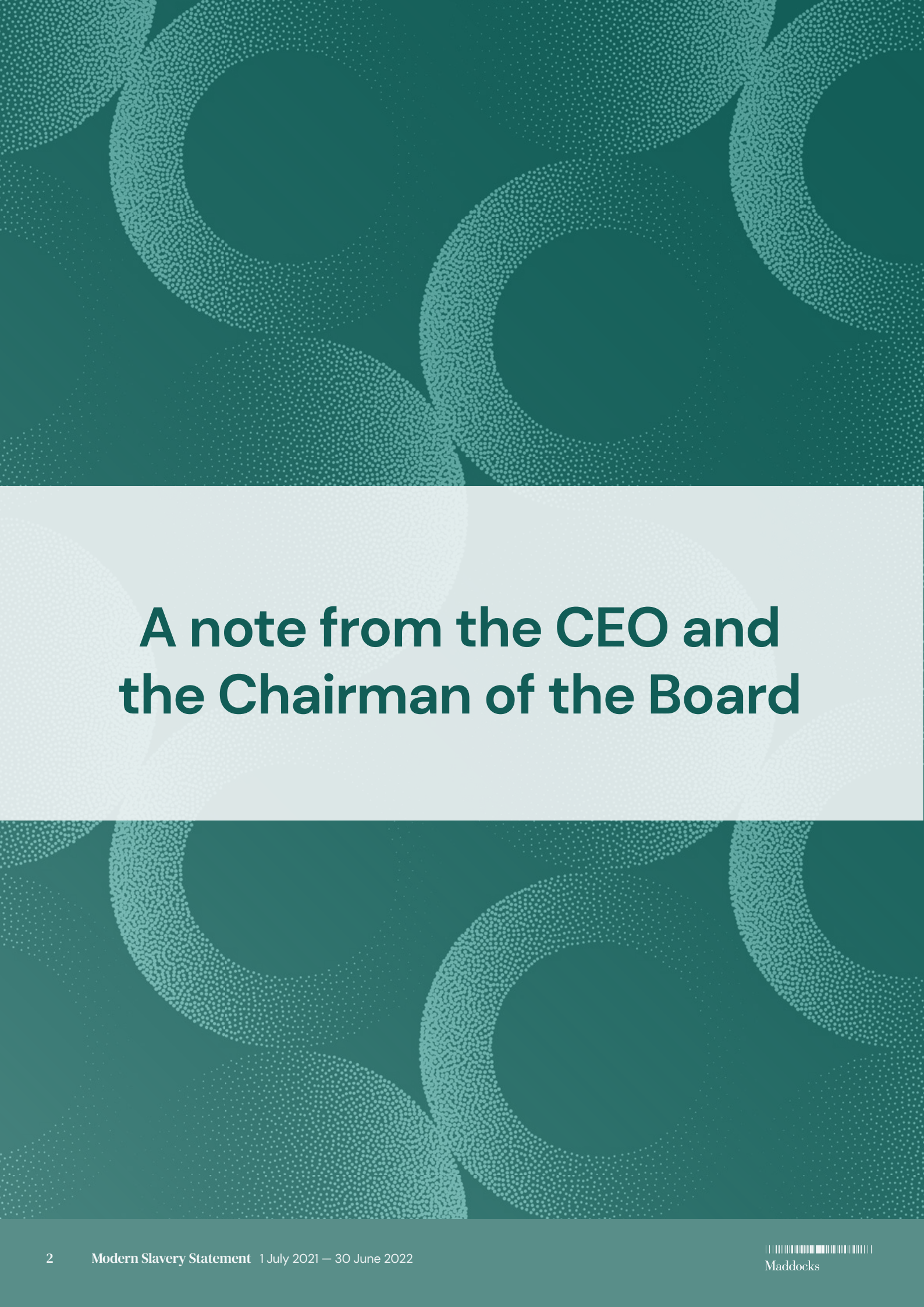
Maddocks

Modern Slavery Statement

1 July 2021 — 30 June 2022

Contents

A note from the CEO and the Chairman of the Board	2
Criterion 1 Identify the reporting entity	4
Criterion 2 Describe the reporting entity's structure, operations and supply chains	6
Criterion 3 Risks of modern slavery practices in our operations and supply chains	8
Criterion 4 Actions we have taken	12
Criterion 5 The effectiveness of our actions	20
Criterion 6 Our consultation process	24
Criterion 7 Provide any other relevant information	26
What is next?	28
Approval and signing	30
Statement Annexure: Mandatory Criteria	32



A note from the CEO and the Chairman of the Board

At Maddocks, our goal is to make a difference for our clients, each other and the community. Our commitment to human rights is a fundamental part of achieving this goal.

Whether it's the work we do for our clients, the way we engage with suppliers, our pro bono program, or supporting human rights initiatives through our charitable program, Maddocks is committed to upholding and promoting human rights, and acting ethically in everything we do.

Modern slavery is a global and complex human rights challenge faced by governments and businesses alike, and encompasses exploitive practices such as debt bondage, servitude, child labour, forced labour and human trafficking. With more than 40 million people around the world estimated to be victims of modern slavery, the issue demands our attention.

We embrace our obligations as a reporting entity under the *Modern Slavery Act 2018* (Cth), and recognise the significant role that organisations such as ours can play in preventing worker exploitation.

This is our third statement since the introduction of the Modern Slavery Act. It sets out the clear steps that Maddocks has taken during our third reporting year (the financial year ending 30 June 2022) to identify, assess and address modern slavery risks within our operations and supply chain.

The steps we have taken this year, continue to build on the foundational work completed during our first and second reporting periods, to identify modern slavery risks across our supply chain and operations and the mechanisms, systems and processes that hold us to account.

We have also taken steps at a firm wide level to further embed our commitment to addressing modern slavery. This includes communicating with all of our staff about what modern slavery is and the steps we are taking, as well as more targeted training for the individuals responsible for procurement in our Business, Communications and Marketing, People and Culture, Facilities and our Finance Departments.

This year we also launched a new Supplier Code of Conduct, which highlights our commitment to modern slavery mitigation and explains our expectations of suppliers in relation to modern slavery.

We are pleased to report that we have not identified any specific instances of modern slavery. More importantly, we remain committed to a program of continuous improvement in the years ahead, further developing our systems and controls within our business to effectively prevent and manage the risks of modern slavery.

This statement has been approved by Board of Maddocks in accordance with the requirements of the Modern Slavery Act ([see page 31](#)).



David Newman
Partner & CEO



Mark Henry
Partner & Chairman
of the Board

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Criterion 1

Identify the reporting entity

Section 16(1)(a) of the Modern Slavery Act requires modern slavery statements to identify the reporting entity or entities covered by the statement. This section confirms that Maddocks is the only reporting entity covered by this Statement.

This modern slavery statement (**Statement**) is made by Maddocks ABN 63 478 951 337, Collins Square, Tower Two, Level 25, 727 Collins Street, Melbourne VIC 3008 (referred to as **we, us, Maddocks, the Firm** in this Statement).



Maddocks

Maddocks is a single reporting entity under the *Commonwealth Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) and this Statement is submitted and published for the financial year ending 30 June 2022, in accordance with section 13 of the Modern Slavery Act.

This Statement addresses each of the seven mandatory criteria for reporting set out in section 16 of the Modern Slavery Act.

Criterion 2

Describe the reporting entity's structure, operations and supply chains

Section 16(1)(b) of the Modern Slavery Act requires modern slavery statements to describe the structure, operations and supply chains of the reporting entity. This section outlines our structure, operations and supply chains, including the nature of our supply chain at a high level.

Our Structure

Maddocks is a proudly independent Australian law firm, operating as a partnership. Maddocks currently has 91 partners, and over 550 employees, nationally.

Maddocks wholly-owns Maloch Pty Ltd ACN 005 387 100, which is a service entity providing administrative and other support services to Maddocks.

Our Operations

Maddocks has been providing legal services in Australia since 1885 from our Melbourne office, while we began expanding our operations with the opening of our Sydney and Canberra offices in 2002 and 2012 respectively. Maddocks delivers a broad range of commercial legal services to public and private entities, not-for-profits and individuals throughout Australia and internationally.

Maddocks provides legal advice across a range of sectors, and 43 practice areas. Our key areas of expertise include:

	Construction
	Corporate & Commercial
	Dispute Resolution & Litigation
	Employment & Workplace
	Government Advisory
	Real Estate

In addition to the Firm's core legal services, Maddocks operates ML&C Collections, our debt recovery agency.

We have also established Maddocks Foundation, a charitable program which supports community projects and programs by providing annual grants to charitable organisations across Australia.

Our Supply Chains

Maddocks procures goods and services in the following key categories:

	Information Technology
	Premises and Facilities
	Marketing and Business Development
	Professional Services
	Knowledge, Learning and Development
	Recruitment

The majority of the goods and services that we procure come from suppliers based in Australia. Key suppliers are engaged on a long-term contractual basis, while arrangements with smaller suppliers are sometimes short term and ad hoc.

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Criterion 3

Risks of modern slavery
practices in our operations and
supply chains

Section 16(1)(c) of the Modern Slavery Act requires modern slavery statements to describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls. This section describes the key risk areas for modern slavery for Maddocks, which mainly relate to our supply chain.

In this section we identify the 'risks of modern slavery practices', meaning the potential for Maddocks to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.

The Modern Slavery Act defines 'modern slavery' as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services.

In our first two reporting periods, Maddocks completed a detailed scoping exercise to identify key areas of modern slavery risk in our operations and supply chain based on Commonwealth Guidance, and then developed and implemented a comprehensive **Supplier Survey**, targeting those suppliers identified as posing a higher risk, to help identify modern slavery risks in our supply chains.

Drawing on the responses from the Supplier Surveys, the firm identified specific supplier responses that indicated a lack of visibility over elements of their supply chains, and/or a lack of policies and procedures to address modern slavery risk. In this reporting period, Maddocks engaged further with these suppliers by requesting additional information about potential modern slavery risks in their own supply chains and providing an explanation of Maddocks expectations of suppliers with regard to modern slavery risk.

We have used the intelligence derived from our initial detailed scoping exercise, together with the responses to the Supplier Surveys and subsequent requests for further information from suppliers, to identify the operational and supply chain risks described on the [following page](#).

Risks in our operations

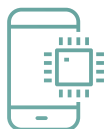
As the key operational functions of Maddocks involve the employment or engagement of staff in our offices in Melbourne, Sydney and Canberra to deliver legal services or support the delivery of our legal services, Maddocks has assessed the risk of modern slavery in its operations as remaining relatively low.

This risk assessment was made on the basis that the legal services profession is strictly regulated, our operations are located entirely within Australia, and the legal framework and our own policies and procedures which regulate conditions of employment of our staff (further described in Criterion 4 – Actions taken relating to our operations), provide a high level of protection against the risk of modern slavery occurring within our operations.

At this stage, the main area of operations we have identified as presenting a higher risk of modern slavery is our charitable program, which supports community projects and programs by providing annual grants to charitable organisations across Australia. We have taken further steps in this reporting period to address this operational risk and improve our oversight of this program, as outlined in [Criterion 4](#).

Supply chain risks

After reviewing the responses received from our Supplier Surveys and subsequent requests for information, we have identified the following key risks in our supply chain:



Sector and industry risks:

Electronics and textiles both remain high risk industries globally. We understand that the nature of these sectors in which some of our key suppliers operate means that their workforce is more vulnerable to exploitation.

- Maddocks procures IT equipment including phone headsets, mobile phones, laptops, monitors and accessories.
- Maddocks sources sports uniforms.



Product and services risks:

Paper and coffee beans are recognised as high-risk products globally. Similarly, services such as cleaning are also recognised as high-risk.

- Maddocks procures stationery, including for marketing purposes.
- Maddocks uses the cleaning services provided by the building management at each of our office sites. Responses to our Supplier Surveys acknowledge that cleaning services have an inherent risk of modern slavery as positions often have lower wages, involve manual labour and are frequently on a casual basis. Workers are also often from migrant, low socio-economic, or culturally or linguistically diverse backgrounds.
- Maddocks procures coffee beans for its in-house café.



Geographic risks:

Some countries may have higher risks of modern slavery. The *Global Slavery Index 2018* of the Mindereroo Foundation ranks countries based on the government response to modern slavery. Maddocks procures goods and services from the following countries, which may present a higher risk of modern slavery:

- **South Africa:** our outsource provider, providing word processing, debt recovery, property development law clerk support and s173 agreement support, is located in South Africa.
- **China and India:** Our laptop and IT accessory provider has manufacturing sites in China and India. We also source umbrellas, sports uniforms, and branded items such as pens and water bottles, which may be made in China.
- **The Philippines:** One of our IT support suppliers is located in the Philippines.
- **Malaysia:** During the first half of the reporting period, our managed and cloud services support were provided by a supplier in Malaysia. In the second half of the reporting period, we moved to procure these services from a different supplier based in Australia, thereby reducing the geographic risk for this procurement stream.

The Supplier Survey responses indicate that some of our suppliers have sub-suppliers located in high-risk jurisdictions including India, China, Vietnam, South Africa and the Philippines.



Entity risks:

Some entities may have higher risks of modern slavery because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.

- We have not identified any entity-specific risks. However, some suppliers' responses indicate a lack of policies, procedures or contractual controls in managing their own supply chains.



Criterion 4

Actions we have taken

Section 16(1)(d) of the Modern Slavery Act requires reporting entities to describe the actions they have taken to assess and address the risks outlined in the previous section, including due diligence and remediation processes. This section addresses this criterion by detailing the steps taken by us during the reporting period to assess and address modern slavery risks as well as our agreed roadmap.

Actions taken in the reporting period

Maddocks recognises that developing and effecting an anti-modern slavery program is an ongoing journey of continuous improvement.

In our third reporting period, we have focused on undertaking the following new actions which are summarised below and explained further in **Actions taken relating to our operations** and **Actions taken relating to our supply chains**:

- continuing to provide training and education to key staff and staff generally, which is fit for purpose based on the role of the staff member
- engaging with our suppliers with a view to educate and assist with improving anti-modern slavery processes in our supply chain
- continuing to implement specific modern slavery clauses in supplier contracts in a prioritised risk-based way
- designing and implementing a new Supplier Code of Conduct
- increasing due diligence on charities sponsored by the Maddocks Foundation.

Read on for an overview of the steps we have taken during this reporting period to assess and address the risks in our operations and supply chains, and the existing policies and processes we have in place that can be used to facilitate further assessment, prevention and mitigation of modern slavery risk.

Actions taken relating to our operations

Management systems and controls

We continue to enjoy the benefit of a cross-functional Anti-Modern Slavery Project team, to oversee the Firm's modern slavery response. The team includes our Chief Operating Officer, Chief Information Officer, Head of Knowledge, Facilities Manager, Director of People and Culture, and Director of Business Development, Communications & Marketing.

In this reporting period, we updated the firm's central risk register to include a section on modern slavery risk. We made this change to ensure that modern slavery risk will be formally monitored and assessed by the Risk Committee and Board in accordance with the firm's risk management procedures.

Anti-Modern Slavery Policy

We have continued to raise awareness of Maddocks Anti-Modern Slavery Policy, which complements the firm's Code of Ethical Conduct and Procurement Policy. This Anti-Modern Slavery Policy sets out our approach to ethical sourcing and the prevention of worker exploitation — including modern slavery— within our own business operations and our broader supply chains. The policy explains:

1. The concepts of modern slavery in a digestible way;
2. The firm's commitment to improving our response to the risks of modern slavery;
3. How to identify potential indicators of modern slavery and the risk factors such as geographic risk, high risk industries, and suspicious behaviours;
4. The obligation on Maddocks partners and staff to report actual or suspected modern slavery.

Related Policies

Maddocks' operations are governed by a formal Code of Ethical Conduct (**Ethical Code**). This Ethical Code is founded on one of the Firm's core values – Integrity. The Ethical Code sets out guidelines to ensure Maddocks conducts its business with the highest standard of integrity and in accordance with all applicable laws and regulations. The Ethical Code also includes processes for reporting unethical or illegal conduct. This reporting period, we updated the Ethical Code, the Procurement Policy, and our Anti-Modern Slavery Policy to include specific references and links to the firm's new Supplier Code of Conduct.

Employment practices

We have robust policies and procedures in place for recruitment and remuneration of staff, ensuring compliance with all applicable employment laws and regulations. For all new partners and staff, our onboarding processes includes verification of experience, qualifications, and rights to work in Australia. Staff in support roles, shared services, as well as graduates are covered by the *Legal Services Award*, which is reviewed annually by our People and Culture team to ensure we comply. Lawyers (not including graduates) have their salaries benchmarked against the industry.

Maddocks charitable program

As outlined in our previous reporting period, Maddocks charitable program has been, and continues to be, identified as a potential higher risk for modern slavery in our operations. We have continued our due diligence processes for recipients under our charitable program by monitoring for news in the media and using a range of research platforms, including Westlaw and Lexis Advance, to identify any modern slavery risks and incidents connected with these recipients. We are pleased to report that no modern slavery incidents have been identified.

We have taken further steps this reporting period by including modern slavery questions in the Maddocks Foundation Grant Application Form, which will now be used on an ongoing basis. The first question asks the organisation to provide detail of any incidents or reports they were aware of within their organisation relating to child labour, forced or bonded labour, physical abuse or discipline, threats of abuse, verbal abuse, harassment, other forms of intimidation, discrimination and violation of employment standards. The second question focuses on any systems and procedures that the organisation has to detect, monitor and address any of the above modern slavery risks.

There were no situations identified by the potential recipient organisations of any modern slavery in their organisations. Given the size of many of the organisations applying for the grant and not having reporting obligations, many of the charities did not have policies specifically addressing modern slavery risk.

Actions taken relating to our supply chains

External supplier assessment

In our previous reporting period, we identified some trends in responses from our Supplier Surveys including a general lack of understanding of key concepts including supply chain and sub-suppliers, a lack of insight into supply chains and a lack of grievance mechanisms (ways for workers to anonymously report actual or suspected incidents of modern slavery).

In this reporting period, we addressed the key issues identified by raising awareness and further educating suppliers with targeted additional questionnaires. We provided nine of our suppliers with an explanation of Maddocks expectations of its suppliers in relation to modern slavery risks. Additionally, we sent further questionnaires to three of our suppliers asking questions specifically around their supply chain.

In addition to this, and where applicable, we sent two of our suppliers an email overview of the key differences between the Australian and UK obligations, if they were a reporting entity under both regimes, and the potential impacts these differences could have.

In the next reporting period, we propose to engage with our labour hire suppliers in the form of a questionnaire, a modified version of the Supplier Surveys sent out in our first reporting period, to help identify and address any areas that may pose potential modern slavery risks to the firm.

Supplier Code of Conduct

We designed and implemented a new Maddocks Supplier Code of Conduct (**Supplier Code**), which complements the firm's Anti-Modern Slavery Policy, Code of Ethical Conduct, and Procurement Policy. The Supplier Code articulates our expectations of suppliers in relation to modern slavery, as well as other ethical, human rights, labour, health and safety and environmental standards.

The firm has also established an internal register listing the names of the suppliers who have received our Supplier Code. Since its implementation in April 2022, until the end of the reporting period, 24 suppliers have received and agreed to comply with our Supplier Code.

The Supplier Code has become a crucial step in the firm's procurement processes. Suppliers are required to comply with the Supplier Code as a condition of providing goods and/or services to Maddocks. It is a key part of raising awareness about modern slavery risks with all of our suppliers, and particularly for our smaller suppliers who are not themselves reporting entities under the Modern Slavery Act and therefore may be less aware of the relevant issues.

Policies

Ethical procurement is a well-established principle in our procurement processes. Maddocks has a Procurement Policy, Ethical Code and an Environmental Policy. These require all procurement to be ethical and to comply with applicable laws and include processes for reporting unethical or illegal conduct. These policies were updated last reporting period to include specific sections on modern slavery. This reporting period, further amendments were made to these policies to make reference to our newly implemented Supplier Code.

Supplier vetting and monitoring

Maddocks has identified a number of existing processes used to assess and monitor suppliers, which can be leveraged to assess and address modern slavery risk. For example:

- reference checking for potential suppliers
- completion of a 'request for information' questionnaire for potential suppliers. We have incorporated specific modern slavery due diligence questions into our screening process for potential suppliers in IT and key procurement tenders during this reporting period
- to monitor existing suppliers, Maddocks conducts site visits from time to time, including to overseas sites. However, due to COVID restrictions, no such site visits were conducted during this reporting period.

Modern slavery clauses in supplier contracts

Maddocks continues to include modern slavery clauses in new supplier contracts, as well as in any renewal contracts. To remain consistent with the Commonwealth Government's recommendations, we continue to use the suite of developed clauses which are of tiered complexity and are issued according to the level of risk of modern slavery practices occurring in the performance of the contract.

The firm has an internal contracts register which lists the contracts that include modern slavery clauses. This internal record allows the firm to quantify the number of contracts entered into in each reporting period. During this reporting period, Maddocks entered into forty-one (41) new contracts (or contract renewals) that included appropriate modern slavery clauses according to the level of risk occurring in the performance of the contracts. We will continue to include these clauses in our supply contracts, both new and existing, to further educate our suppliers about modern slavery risk and mitigation, and to encourage suppliers to raise any concerns they may have if modern slavery incidents are suspected.

Training and education of staff:

During the reporting period, we have:



Conducted face to face training (via Teams) regarding compliance with the Modern Slavery Act, in particular the ethical procurement of suppliers. This session was attended by the firm's shared services staff with responsibility for procurement and dealing with our suppliers across all three offices. This included staff from Business Communications and Marketing, People and Culture; Facilities, Finance; and Procurement.



Launched our new Supplier Code of Conduct setting out the firm's expectations of suppliers, which addresses modern slavery, as well as other ethical, human rights, labour, health and safety and environmental standards. This was rolled out to relevant staff as part of our face-to-face training session.



Updated Maddocks Induction Training Programme to include a section on Modern Slavery. As part of this section, new joiners are required to review and acknowledge the firm's Anti-Modern Slavery Policy.



Published a piece in Maddocks firmwide internal newsletter to inform staff of the launch of the new Anti-Modern Slavery Policy.



Worked closely with our appointed 'modern slavery compliance champions' within the firm – these include Partners and legal staff who have been responsible over the last four years to be across developments in the modern slavery space and support the activities of our Anti-Modern Slavery Project team and generally help to assist with our Modern Slavery Act compliance.



Monitored and reviewed updates and guidance from:

- the Australian Government (the Australian Border Force)
- independent reports into the Modern Slavery Act published by the Monash Centre for Financial Studies and Pillar Two (commissioned by ASCI),

to inform our approach and in our commitment to continuous improvement.

Benchmarking exercise

Maddocks continues to monitor the modern slavery statements of other law firms, to better understand how others in the legal profession are approaching modern slavery risk, and to inform the continuous improvement of our own compliance plan.

During this reporting period we also reviewed other professional services and law firms' Supplier Codes of Conduct, to improve our understanding of the key topics addressed, how compliance is enforced, as well as best practice around reporting any incidents that may have occurred.

This benchmarking exercise specifically assisted in the creation of a well-balanced Supplier Code of Conduct and allowed us to ensure we were taking into consideration industry-specific risks. This process has been very insightful with the majority of our suppliers compliant and willing to meet our expectations when providing products and services.



Case study

Launch of our new Supplier Code of Conduct

During this reporting period, we designed and implemented a new Maddocks Supplier Code of Conduct (**Supplier Code**), which further complements the firm's existing policies on modern slavery, ethical conduct and procurement.

The Supplier Code sets out the firm's expectations of suppliers in relation to modern slavery, as well as ethical, human and labour rights, health and safety and environmental standards. As a firm, we want to continue raising awareness about the risks of modern slavery within supply chains, in particular with our smaller suppliers who may not have as much knowledge or understanding about the associated risks. The expectation is that all suppliers will need to comply with the Supplier Code as a condition of providing goods and/or services to the firm.

Overall, the roll out of the Supplier Code has been extremely well received by suppliers and has become a crucial step in the procurement process.

In addition to the implementation of the Supplier Code, the firm has established an internal register listing the names of the suppliers who have received our Supplier Code. Since its implementation in April 2022, until the end of the reporting period, 24 suppliers have received and complied with our Supplier Code.

We will continue circulating the Supplier Code and recording this in our register to provide more quantifiable data in future reporting periods.

Case study

Learnings from our training

We continued our training and education on modern slavery throughout the firm during this reporting period by holding a face-to-face (via Teams) training session with staff from the firm's shared services team.

The staff members invited to attend the training session each play an important part in Maddocks procurement processes via day-to-day interactions and/or relationship management with our suppliers.

Therefore, the firm identified these staff as playing a crucial role not only in being able to educate their own teams, but also in their capacity to influence and educate suppliers and identify key areas of modern slavery risks within the firm's supply chains. Attendees included members from Business, Communications and Marketing, People and Culture, Facilities and our Finance Department.

The aim of this session was to deliver a more in-depth explanation of modern slavery, and to provide staff with real life scenarios to demonstrate how to identify modern slavery in a professional services workplace such as ours, and which are relevant to the types of suppliers we engage. We are aware that there is a misconception of modern slavery not occurring in Australia, however being able to provide our staff with examples of modern slavery in the Australian context as well as globally, heightened staff awareness of such risks.

The session also provided staff with further information about what the firm is currently doing in this space, and where staff can find useful resources to assist with any questions or concerns they may have.

During the training, we launched our new Supplier Code of Conduct to the staff in attendance. The Supplier Code of Conduct was well received and has become a very useful tool during this reporting period to provide further guidance to our staff and educate our suppliers of our expectations.

A useful indicator to the firm that the training was effective was through the positive feedback received from attendees. For example, one attendee commented:

This course was very beneficial, it made me aware that the problem of modern slavery was much more extensive than I had previously thought. Thanks to the course I now know what my responsibilities are with regards to this matter and my role at the firm. I am now also aware of the firm's reference tools on this and who to seek further assistance from in the firm if needed.

We intend to continue developing our training program during the next reporting period to increase staff awareness of the issues and the role we all have to play in mitigation of the risk.



Criterion 5

The effectiveness of our actions

Section 16(1)(e) of the Modern Slavery Act requires modern slavery statements to describe how the reporting entity assesses the effectiveness of the actions being taken to assess and address modern slavery risks. This section addresses this criterion by outlining the steps taken by us during the reporting period to review the effectiveness of our actions to assess and address modern slavery risks.

With the firm making a commitment of continuous improvement to monitor progress of our own modern slavery project through key performance indicators. This reporting period, the firm has both quantitative and qualitative data to demonstrate our progress, which allows for greater oversight and mapping for future reporting periods.

Quantitative Assessment of our actions

Modern slavery KPIs

Key Objective	Key Performance Indicator	Summary of Performance
<p>Employee training and awareness</p> <p>Our training programs aims to assist in raising awareness of the key concepts of modern slavery and educate our staff on how to identify and assess any potential or perceived risks of modern slavery in the firms or through our supply chains.</p>	<p>The number of staff who have received training regarding Modern Slavery.</p>	<ul style="list-style-type: none"> All new staff are now required to read and confirm they have understood the firm’s Anti Modern Slavery Policy in our induction training program. 26 of our shared services staff with responsibility for procurement have received face to face (via Teams) training. Qualitative feedback has been obtained from employees in relation to training provided (see next page).
<p>External supplier surveys</p> <p>Building on responses from last reporting period, we addressed the trends in responses to our Supplier Surveys to further raise awareness and educate suppliers with more targeted and specific questionnaires.</p>	<p>The number of suppliers who respond to our second round of external Supplier Surveys.</p>	<ul style="list-style-type: none"> We provided 9 of our suppliers with an explanation of Maddocks expectations of its suppliers in relation to modern slavery risks. Additionally, we sent further questionnaires to 3 of our suppliers asking questions specifically around their supply chain. Of these, 2 suppliers responded. In addition to this, we sent 2 of our suppliers an email overview of the key differences between the Australian and UK obligations, if they were a reporting entity under both regimes, and the potential impacts these differences could have.

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Modern slavery KPIs

Key Objective	Key Performance Indicator	Summary of Performance
<p>Modern Slavery clauses in our supplier contracts</p> <p>We continue to use the suite of developed clauses which are of tiered complexity and are issued according to the level of risk of modern slavery practices occurring in the performance of the contract.</p>	<p>The number of supplier contracts incorporating modern slavery clauses.</p>	<ul style="list-style-type: none"> During this reporting period, Maddocks entered into 41 new contracts (or contract renewals) that included appropriate modern slavery clauses according to the level of risk occurring in the performance of the contracts.
<p>Roll out of our Supplier Code of Conduct</p> <p>The aim of our Supplier Code of Conduct is to set out the minimum ethical standards and business practices we expect from our Suppliers including raising awareness of modern slavery and providing mechanisms for addressing any potential or perceived modern slavery risks.</p>	<p>The number of supplier contracts requiring compliance with our Supplier Code of Conduct.</p>	<ul style="list-style-type: none"> The firm has established an internal register listing the names of the suppliers who have received our Supplier Code. Since implementation in April 2022, until the end of the reporting period, 24 suppliers have received and complied with our Supplier Code.
<p>Reporting procedures under our Supplier Code of Conduct</p> <p>Monitoring the number of modern slavery concerns raised under our reporting procedures outlined in our Supplier Code of Conduct.</p>	<p>The number of concerns raised under our reporting procedures.</p>	<ul style="list-style-type: none"> There have been no issues or concerns raised by any of our Suppliers or third parties through our reporting procedures.
<p>Annual compliance plan</p> <p>To ensure we are tracking in a direction of continual improvement, we monitor our compliance against our annual compliance plan.</p>	<p>The percentage of completion of our annual compliance plan.</p>	<ul style="list-style-type: none"> We successfully completed 100% of our planned key priorities in this reporting period (as set out in our previous modern slavery statement).

Maddocks intends to periodically review these key performance indicators to determine whether they continue to represent appropriate criteria for measuring the effectiveness of Maddocks efforts to assess and address modern slavery risks.

Qualitative Assessment of our actions

During this reporting period, the firm held a face-to-face training session (via Teams) with staff from the firm's shared services team. Attendees included members from Business, Communications and Marketing, People and Culture, Facilities and our Finance Department. A useful indicator to the firm that the training was effective was through the positive feedback received from attendees.

Maddocks received the following feedback from an employee:

“

This course was very beneficial, it made me aware that the problem of modern slavery was much more extensive than I had previously thought. Thanks to the course I now know what my responsibilities are with regards to this matter and my role at the firm. I am now also aware of the firm's reference tools on this and who to seek further assistance from in the firm if needed.

”



Criterion 6

Our consultation process

Section 16(1)(f) of the Modern Slavery Act requires reporting entities to describe the process of consultation with any entities that the reporting entity owns or controls. To address this criterion, this section outlines how Maddocks prepared this Statement including consultations with Maloch Pty Ltd.

Maddocks wholly owns Maloch Pty Ltd, which operates as Maddocks service company. As Maloch Pty Ltd is integrally connected to Maddocks business, the operations and supply chains of Maloch Pty Ltd have been included in our modern slavery response plan.

Accordingly, any references in this Statement to Maddocks' operations and supply chain include the operations and supply chain of Maloch Pty Ltd.

For the avoidance of doubt, this Statement is a single modern slavery statement by Maddocks, and not a joint statement. Maloch Pty Ltd is not a reporting entity for the purposes of the Modern Slavery Act.

Given Maloch Pty Ltd is integrally connected to Maddocks, including sharing the same key staff across procurement and shared governance and risk assessment structure, it was not necessary to have a formal consultation process.

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Criterion 7

Provide any other relevant information

Section 16(1)(g) of the Modern Slavery Act allows for reporting entities to include any other relevant information that the reporting entity thinks is relevant. Based on Government guidance, we think it is relevant to outline the impacts of Covid-19 as well as how Maddocks has been contributing to the discussion of modern slavery more broadly.

The Impacts of COVID-19

The impact of the COVID-19 pandemic on workers, government, civil society groups and organisations continues to be significant. Maddocks understands that the COVID-19 pandemic has increased the risk of modern slavery around the world, not only by disrupting anti-slavery efforts but also by increasing the vulnerability of workers and creating new risks of slavery. The impacts of COVID-19 will continue to be considered as part of our ongoing supplier due diligence program.

As government restrictions in response to COVID-19 ease, the firm will best consider how, where appropriate, to undertake 'on the ground' activities that would help to identify modern slavery risks and incidents, such as supplier site visits.

Last reporting period we were mindful that as COVID-19 restrictions were eased and staff returned to our offices, additional procurement streams were required (for example sanitiser, face masks, Rapid Antigen Tests (RATs), cleaning services etc).

We have undertaken a considerable amount of due diligence regarding these procurements streams this reporting period, to better understand the source of these products and services we were using. We are satisfied to report that there have been no modern slavery risks identified. As COVID-19 safety measures are still being used by the firm, we will continue our due diligence, and monitor procurement of these products and services.

Maddocks thought leadership

Maddocks has taken a keen interest in the prevention of modern slavery, not just in terms of the Firm's own compliance, but more broadly, in terms of how we can assist others in their stance against slavery.

We care about human rights and seek to make a practical contribution to raise collective awareness about this important issue. We are committed to educating our clients in this area.

We have a significant anti-modern slavery practice servicing a number of clients. During the reporting period, several resources regarding modern slavery compliance remain available on our website. We also assisted, during the reporting period, an ASX listed entity to prepare the programming for its inaugural Anti-Modern Slavery Summit for its leaders from across the globe.

The Introduction of the NSW Regime

Maddocks also acknowledges the introduction of the *Modern Slavery Amendment Act 2021* (NSW) (**NSW Act**) during the reporting period, making New South Wales the first state to have a standalone legislation tackling modern slavery.

While Maddocks is not regulated by the NSW Act, we appreciate the NSW Act impacts many of our clients including NSW government agencies and NSW local councils. During the reporting period we have reviewed and monitored the guidance and resources published by the NSW Government, not only to advise our clients but to assist to develop our understanding of modern slavery issues. We appreciate that the NSW Act is more than a reporting requirement and requires NSW Government agencies and local councils to take reasonable steps to ensure that the goods and services they procure are not the product of modern slavery.

We appreciate that Maddocks is a 'supplier' to NSW Government agencies and local councils. We consider that the significant investment we have made into our anti-modern slavery compliance for the purpose of the Modern Slavery Act will be valuable as we continue to service our NSW Government clients.



What is next?

Maddocks is committed to continuing improvement in our stance against modern slavery. We are looking forward to building on the work described above. Our key priorities for the next reporting period are:

Continued training: We will design and implement mandatory online e-module training for staff to continue educating our people on modern slavery risks, and to support them in identifying, preventing and mitigating modern slavery risks in Maddocks business and supply chains. This will complement and build on the training and education we have already conducted.

Engaging with our suppliers: We intend to send out a tailored version of our original Supplier Surveys to any labour hire companies utilised by the firm. The aim of these surveys will be to gain a better understanding of who these companies are employing, how they are being paid and the working conditions to which they are subjected to. Where responses suggest areas of concern, we will further engage with the labour hire companies with a view to educate and assist with improving both our anti-modern slavery processes in our supply chain and theirs, as we have previously undertaken with our other suppliers in our supply chain.

Continuing to implement specific modern slavery clauses in key supplier contracts, in a prioritised risk-based way.

Continuing to circulate our Supplier Code of Conduct to key existing suppliers and any new suppliers, in a prioritised risk-based way.

Establish an internal landing page for educational and training purposes for all of the firm's staff. This will allow all staff to access material about Modern Slavery, the firm's reporting obligations, read articles and policies published by the firm, access training resources and read Frequently Asked Questions.

Design and create a Risk Assessment Tool to assess our current and future suppliers in a formalised, cohesive way. The Risk Assessment Tool will be able to assist Maddocks in identifying the level of due diligence required (questionnaires and education) depending on the goods and/or services provided, the industry or sector the supplier operations in, the nature of their workforce and their geographical location.

Monitoring guidance issued by the Australian Border Force: We are aware that the Australian Border Force monitors the quality of statements and issuing supplementary good practice guidance on preparing modern slavery statements. We intend to review and consider any new supplementary guidance and continue to improve our approach in line with 'good practice' trends, where possible.

Monitoring amendments to the Modern Slavery Act: We are aware that there is an active review of the legislation currently taking place and expected to be completed by early 2023. We intend to review and consider any revisions made and take appropriate steps to comply with any additional reporting requirements and obligations imposed on Maddocks.

Develop an Incident Response Guide to assist our staff in identifying any known or suspected incidents of modern slavery in our supply chain. The Guide will also provide relevant tools for staff to assess the incident and offer a range of preferred remediation options based on the nature and severity of the incident.

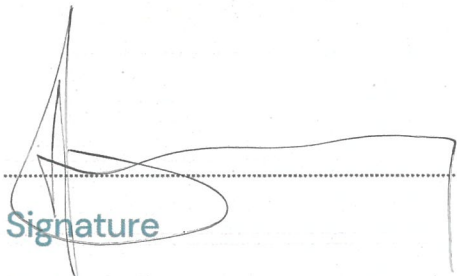
Approval and signing

Section 13(2) of the Modern Slavery Act requires statements for single reporting entities to be approved by the principal governing body of the entity and signed by a responsible member of the entity. The Commonwealth Guidance states: "It is best practice that the head of the principal governing body signs the statement (for those entities where the responsible member is a member of the principal governing body). For example, if the reporting entity has a board, then the chair of the board or the Chief Executive (if they are a member of the board) should sign your statement." Accordingly, this section outlines how our Statement has been approved by our Board and signed by our Chairman of the Board.

In accordance with Section 13(2) of the Modern Slavery Act, this Statement was approved by the Board of Maddocks (ABN 63 478 951 337) on 7 December 2022.

The Board is the principal governing body of Maddocks, for the purposes of approving this Statement.

This Board has authorised Mark Henry, Partner and Chairman of the Board to sign this Statement.



Signature

Mark Henry
Partner and Chairman of the Board
Maddocks, an Australian partnership

7 December 2022

Date

Statement Annexure: Mandatory Criteria

The table below sets out the page numbers of our Statement that address each of the mandatory criteria in section 16 of the Modern Slavery Act:

Mandatory Criteria	Page number/s
a. Identify the reporting entity.	Page 4-5
b. Describe the reporting entity's structure, operations and supply chains.	Page 6-7
c. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Page 8-11
d. 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.	Page 12-19
e. Describe how the reporting entity assesses the effectiveness of these actions.	Page 20-23
f. 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).	Page 24-25
g. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Page 26-27

Maddocks is an independent Australian law firm that provides legal services to corporations, businesses and governments throughout Australia.

We advise clients across consumer markets, construction, technology, telecommunications, healthcare, education and professional services from our Canberra, Melbourne and Sydney offices. We aim to work to make a difference for our clients, each other and the community.

We're committed to our clients. In fact, our brand and market reputation reflect this focus. Our service is based on a deep understanding of our clients' legal requirements in the context of their business objectives. We're highly regarded for exceptional, practical legal services that genuinely add value.

We work collaboratively with our clients to build strong, sustainable relationships – our longest is now more than 100 years old. Our lawyers aim to deliver consistently high standards of service, and we understand the importance of accessibility, responsiveness and transparency. Working with us, you'll enjoy open communication, meaning well scoped, appropriately resourced and effectively managed matters.



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