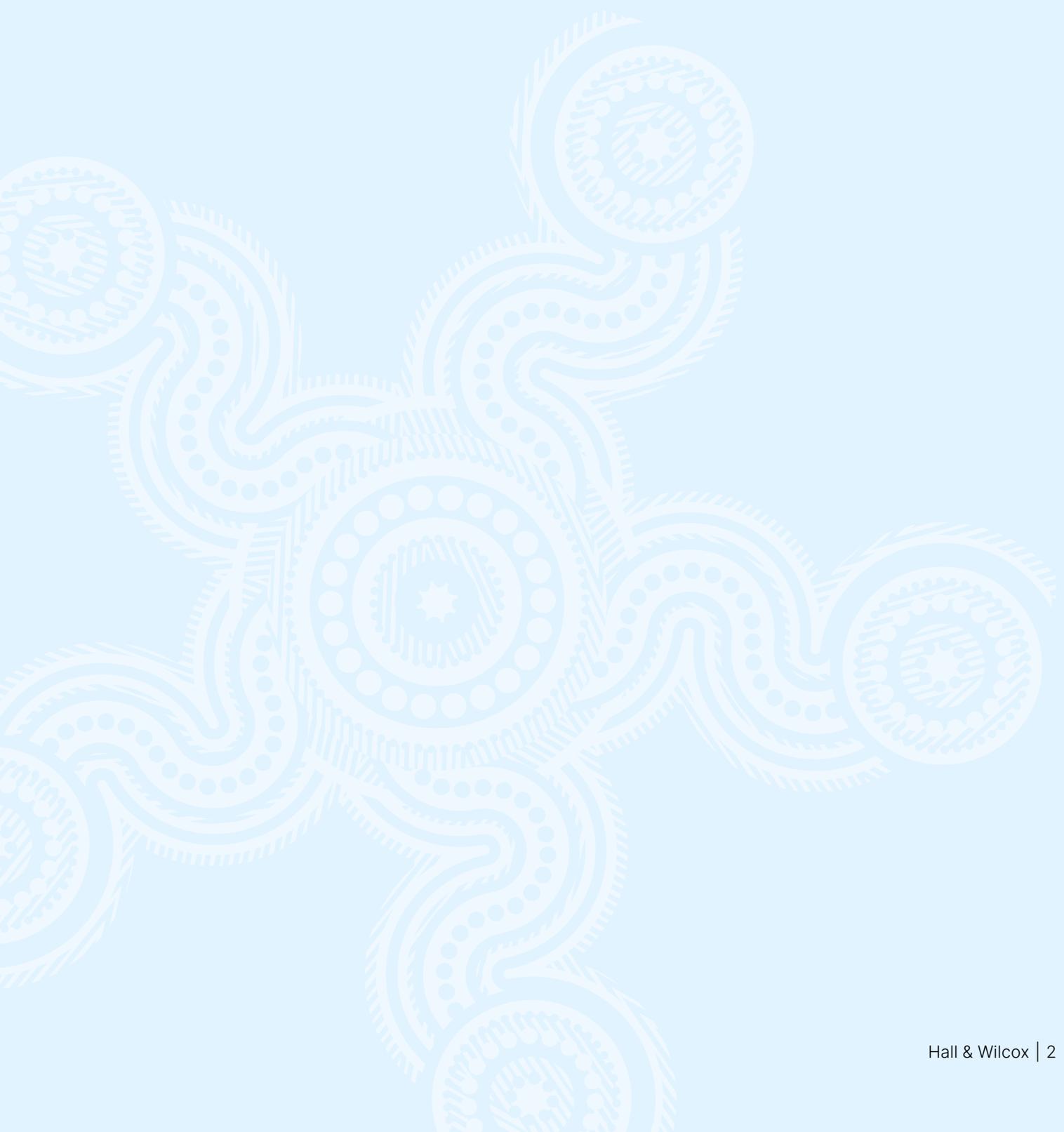


Hall & Wilcox Modern Slavery Statement FY25

Acknowledgement of Country

Hall & Wilcox acknowledges the traditional custodians of country throughout Australia and recognises their continuing connection to land, waters and culture. We pay our respects to their Elders past and present and to all First Nations people.



Introduction

Hall & Wilcox recognises its responsibility to contribute to the elimination of modern slavery and that responding effectively to modern slavery is a process of continuous improvement. This modern slavery statement (**Statement**), our sixth, shows how we are strengthening our response to modern slavery risks, including through further developing our reporting and remediation processes. Our approach aims to be consistent with the UN Guiding Principles on Business and Human Rights (**UN Guiding Principles**).

This Statement has been prepared in respect of the year 1 July 2024 to 30 June 2025 (**Reporting Period**). It is made pursuant to the mandatory reporting criteria in section 16 of the *Modern Slavery Act 2018* (Cth) (**Act**). The table below identifies where each criterion of the Act is addressed in this Statement:

Mandatory criteria for modern slavery statements	Page of this Statement
Identify the reporting entity	3
Describe the reporting entity's structure, operations and supply chains	4 - 7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	8 - 9
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address those risks, including due diligence and remediation processes	10 - 12
Describe how the reporting entity assesses the effectiveness of these actions	13
Provide any other relevant information	13
Describe the process of consultation with any entities the reporting entity owns or controls	13

Reporting entity

Hall & Wilcox (ABN 58 041 376 985) is a reporting entity under the Act. This Statement is made in accordance with section 13 of the Act on behalf of the partnership of Hall & Wilcox and the entities it controls, being Francis Gillman Pty Ltd as trustee for the Francis Gillman Service Trust (**Francis Gillman**), Francis Gillman Finance Pty Ltd as trustee for the Francis Gillman Finance Trust, Francis Gillman Holdings Pty Ltd, H&W Nominees Pty Ltd, Francis Gillman International Pty Ltd and Francis Gillman International Inc. (**Associated Entities**).

The firm incorporated new Associated Entities in advance of commencing limited operations in the Philippines in the next reporting period.

Our structure

Hall & Wilcox is a leading Australian law firm with offices in Melbourne, Sydney, Canberra, Newcastle, Brisbane, Perth, Darwin and Adelaide.¹ We are a firm of over 1200 people, including 151 partners. We build partnerships with and deliver outstanding legal services to corporate, public sector and private clients, both Australian-based and those offshore doing business in Australia. Our success depends upon the success of our clients, our people, and the communities in which we work and live.

Our core practice areas are: Banking and Financial Services, Corporate and Commercial, Litigation and Dispute Resolution, Employment, Insurance, Trusts and Estate Planning, Property and Projects, Cyber, Privacy and Data Protection, Environmental, Social and Governance (**ESG**) and Tax. We also have a thriving pro bono and community practice, with a dedicated Pro Bono Partner.

Our commitment to contributing to our communities is embedded in our firm culture. Our pro bono practice embraces our ethical responsibility as a firm to help those in need and enriches the personal and professional lives of the Hall & Wilcox lawyers who get involved.

Our industry focus is on Investment Funds, Healthcare, Government, Retail and Consumer Goods, Social Infrastructure, Technology and Digital Economy, Education and Training, Energy, Sports and Entertainment and Transport and Trade.

¹ The head office of Hall & Wilcox is Level 31, Queen & Collins Tower, 376-390 Collins Street, Melbourne, Victoria 3000

Our approach

Hall & Wilcox is committed to ESG principles and a sustainable future. Addressing environmental, human rights, modern slavery and other ESG considerations in our operations and supply chains is aligned with our purpose of enabling our clients, our people and our communities to thrive. It is also aligned with our Hallmarks which are our core values and an expression of how we expect our people to go about their work.

By participating in the UN Global Compact (**UNGC**), Hall & Wilcox is committed to implementing the 10 UN Global Compact principles (**Principles**) and advising and supporting clients to implement them also. These Principles take into account the fundamental responsibilities of business in the areas of human rights, labour, environment and anti-corruption.

Our Hallmarks



Stay true



Better together



Evolve always



Be remarkable



Respect respect

Our operations

Hall & Wilcox is a professional services business which predominantly employs professionally qualified and highly skilled people. We have a well-established human resources framework of policies and procedures to ensure compliance with labour laws and regulations and with our core values.

The conduct of our lawyers is regulated by legal profession legislation in each jurisdiction in which we operate, so we consider the risk of causing modern slavery in our operations to be very low.

Francis Gillman provides administrative and support services to Hall & Wilcox and employs all non-legal staff. Corporate Services roles in our operations (including IT, People & Culture, Finance and Operations) are also considered low risk due to their location within Australia and our commitment to operating in compliance with our human resources framework.

Our supply chains

Our supply chains consist of products and services procured to enable our people to deliver our services. Our procurement is decentralised, with purchasing control granted to departments and to a lesser extent local offices.

The map **below** shows where suppliers who completed our modern slavery and human rights questionnaire produce (manufacture or purchase) the goods and/or services that they supply to us:



Our main categories of procurement



Construction



Rental, Hiring and Real Estate Services



Information Technology (including professional services)



Accommodation, Food and Entertainment



Professional and Technical Services



Facilities Management and Property Maintenance



Motor Vehicles and Travel



Retail Trade

Our risk areas

Operations

Hall & Wilcox considers the risk of modern slavery in our operations to be very low due to our commitment to operating in compliance with our human resources framework (as described under 'Our operations'). We are conscious that if any of our clients are associated with modern slavery in their operations or supply chains, we could be linked to such practices through the provision of our legal services to the clients.

Supply chain

While most of the products and services we procure are from suppliers with headquarters and/or operational facilities in Australia or other countries with a low risk of modern slavery, we recognise that there is a risk that we, like other businesses, may be directly linked to the modern slavery practices of individuals and entities deep within our supply chains, including those with which we do not have a direct contractual relationship.

We have not identified any specific instances of modern slavery and our analysis has found that most tier one suppliers pose a low overall risk of modern slavery. Where suppliers were connected to an industry/sector and products/services associated with higher modern slavery risk, the risks were mainly associated with the following categories:

Construction

Our procurement in this category relates mainly to office fit-outs.

We recognise that factors that heighten the risk of modern slavery in this category include the subcontracting of base-skill labour. Additionally, sourcing raw materials and goods from overseas often involves high risk countries and multi-tiered supply chains, resulting in limited visibility of modern slavery risks.

Information technology – hardware and services

Our procurement in this category includes computer hardware and software, cloud services, mobile phones, printers, audio visual equipment, virtual data room services, IT support and consulting services. We procure directly and through suppliers who procure these goods and services on our behalf.

Modern slavery risks are most pervasive in the raw material extraction, manufacturing and disposal stages that are known to attract vulnerable populations in high-risk countries.² The production of electronic products has been linked to labour abuses, including forced labour and child labour.

Our visibility of risks in this category relies on suppliers providing information on their standards and risk management and compliance systems.

² *Modern Slavery Risks, Rights & Responsibilities, A guide for Companies and Investors*, commissioned by the Australian Council of Superannuation Investors and conducted by KPMG, February 2019

Our risk areas

Rental, Hiring and Real Estate Services, Facilities Management and Property Maintenance

Cleaning, security, waste, property maintenance and building operations services are procured by the managers of the larger offices we lease. For our smaller offices, many of these services are procured directly by us.

Labour exploitation in the cleaning industry is well documented. A combination of factors heightens the risk of modern slavery, including the high demand for base-skill labour, reduced visibility of labour standards due to outsourcing, and workers from vulnerable populations, including migrant, low socioeconomic or culturally and linguistically diverse backgrounds.

Accommodation, food, entertainment

This category includes hospitality and catering used for our events. We must consider that providers in this sector may rely on labour procured through outsourcing arrangements and may involve workers from vulnerable backgrounds.

Food industry supply chains have a high risk of modern slavery. In September 2024, the NSW Anti-Slavery Commissioner

released a report addressing the emerging modern slavery risks in the NSW agriculture, horticulture and meat processing industries among temporary migrant workers, particularly Pacific Australia Labour Mobility workers. It includes information suggesting a pattern of conduct involving indicators of forced labour, debt bondage, deceptive recruiting and emerging labour trafficking.³

Manufacturing – primarily associated with retail trade

Our procurement in this category includes branded products and merchandise for events and internal use. While our suppliers are Australian based businesses, modern slavery risks may exist within the supply chains of the products that we buy, with evidence of human rights issues in apparel manufacturing and a lack of visibility of how suppliers or agents manage these issues.

In all areas, Hall & Wilcox aims to work with key suppliers who can demonstrate their adoption of safe and fair employment standards and practices.

³ *Be Our Guests: Addressing urgent modern slavery risks for temporary migrant workers in rural and regional New South Wales*, Office of the NSW Anti-slavery Commissioner, September 2024

Our actions to assess and address potential modern slavery risks

Modern slavery working group

Our modern slavery working group is responsible for determining and implementing our modern slavery response. It includes our Chief Operating Officer, General Counsel, Pro Bono Partner, Director of Technology, Head of Workspace, Head of Projects, National Operations Manager and Risk team members, and draws on a range of expertise across the firm, with key actions managed by respective group members.

As part of determining future actions, the working group will continue to consider the recommendations of the statutory review of the *Modern Slavery Act 2018 (Cth) (Review)* and the Australian Government's response to the Review report, and will monitor changes flowing from the recommendations.

Modern slavery and human rights questionnaires and due diligence

Our understanding of potential modern slavery risks in our supply chain is informed by the responses provided by our suppliers to our modern slavery and human rights questionnaires, modern slavery statements (where available), further engagement with suppliers and insights from a broad range of resources (including from industry, governments and non-governmental organisations).

During the Reporting Period questionnaires were sent to 120 suppliers.⁴ The questionnaires are part of our sourcing process for new suppliers and ongoing due diligence of existing suppliers identified to be at a higher risk of modern slavery.

Suppliers are asked a range of questions, including if they have assessed whether their business has or is causing, contributing, or is linked to adverse human rights impacts and if they have adequate policies, controls, procedures and training designed to prevent, detect, assess, manage and remedy modern slavery in their operations and supply chains.

The following five key indicators are used to assess a supplier's modern slavery risk:

1. country of operations/ headquarters;
2. industry;
3. products attributed to a high risk of modern slavery;
4. workforce characteristics; and
5. risk-mitigating measures specific to individual suppliers,

in order to provide an indicative modern slavery risk rating of high, moderate or low.

Of the 120 suppliers who were sent a questionnaire:

- 61.7% of suppliers (74 suppliers) completed the questionnaire;
- 10 suppliers provided their FY24 modern slavery statement instead; and
- 4 suppliers commenced the questionnaire but did not complete it by 30 June 2025.

We have reviewed the modern slavery statements provided to us, and those of non-responders who have published modern slavery statements, to confirm that these suppliers have measures in place or are developing measures to manage modern slavery risks. We engage further with suppliers who did not respond to the questionnaire as part of ongoing supplier management.

Guided by the results of questionnaires, we determine the level of due diligence we undertake. Where further monitoring or specific action is considered appropriate, we will put in place a program to foster collaborative efforts to address potential risks.

As in previous reporting periods, most suppliers who completed the questionnaire were assessed to be at a low risk of modern slavery and no supplier was assessed to be at a high risk. The suppliers assessed to be at moderate risk operated predominantly in the Facilities Management and Property Maintenance and Information Technology categories.

⁴ These suppliers exclude those connected to purchases made on firm issued credit cards.

Information Technology

As part of our due diligence process in this category we reviewed the modern slavery statements of the multinational companies from which our supplier sources our laptops and monitors. We note that the Business & Human Rights Resource Centre's KnowTheChain ICT Benchmark 2025 scored only three out of 45 of the world's biggest IT companies over 50/100 for addressing forced labour risks and impacts in their supply chains. The average score was just 20/100.⁵ Our main supplier of laptops, Hewlett Packard Enterprise Company, scored 53/100.

Facilities Management and Property Maintenance

As part of our action plan relating to cleaning services, we considered the risk assessments and/or modern slavery statements of our building owners, building managers and cleaning services (where available), and their engagement with the Cleaning Accountability Framework (CAF), a multi-stakeholder initiative which seeks to improve labour practices in the cleaning industry. The cleaning services engaged by our building managers in Melbourne, Brisbane, Perth and Adelaide have achieved CAF Prequalification status⁶ and Queen & Collins Tower, which houses our Melbourne office, is a CAF 3 Star Certified Building.⁷

Construction

The head contractors for our Melbourne and Newcastle office fit-outs are reporting entities under the Act and we sought and received additional information about how they manage modern slavery risks. Our Melbourne head contractor has reported that its FY24 procurement was almost all domestically sourced. New vendors are provided with a copy of its modern slavery charter to ensure they are made aware of their obligations prior to engagement and clauses relating to modern slavery are included in subcontracts.

Hall & Wilcox prioritises Australian made products and materials where possible and we are pursuing Green Star⁸ and WELL⁹ certifications for our office fit-outs which complements our modern slavery due diligence efforts (as highlighted in our FY24 modern slavery statement).

⁵ <https://www.business-humanrights.org/en/from-us/press-releases/new-analysis-forced-labour-remains-a-huge-risk-in-tech-industry-supply-chains/>

⁶ Prequalification highlights a company's commitment to fair conditions for cleaners, strong HR practices, and ethical supply chain management.

⁷ The CAF 3 Star standard is the set of labour standards to which CAF certifies a building.

⁸ Green Star certification is a formal process managed by Green Building Council of Australia during which a building, fit-out, or precinct is awarded a rating by an independent third-party assessor.

⁹ The WELL Building Standard (version 2) was developed by the International WELL Building Institute. WELL measures attributes of buildings that impact occupant health. WELL is composed of over one hundred Features that are applied to each building project, and each WELL Feature is designed to address issues that impact the health, comfort or knowledge of occupants.

Policies, processes and templates

Our procurement policy references all policies, processes and guidelines relating to procurement, including the social and sustainable procurement policy. It sets out the firm's processes around ESG-related risk assessments, including the modern slavery and human rights risk assessment, further supplier due diligence, and the reporting and remediation of modern slavery incidents (existing and forthcoming).

It provides that approval of a supplier may be conditional on the inclusion of contractual provisions giving the firm rights and assurances with respect to modern slavery that are commensurate with the risk presented. Alternatively, supplier agreement templates may be used which incorporate modern slavery controls for our suppliers and their supply chains.

Grievance mechanism

During the reporting period the firm undertook a process to select a provider of an anonymous grievance reporting platform. The selected platform will enable modern slavery concerns to be raised by our people and others through the Speak Safely and whistleblowing channels that it provides. We aim to align with the effectiveness criteria set out at Principle 31 of the UN Guiding Principles in the design of this mechanism.

Implementing a grievance mechanism is part of further developing our processes to enable reporting and remediation. It was a proposed action in our FY24 modern slavery statement and is a key element of our action plan relating to our cleaning services.

Training

Our mandatory modern slavery awareness module, part of our induction program for all new starters, aims to develop awareness of how we all intersect with modern slavery in our daily lives. It covers the following topics:

- what is modern slavery and the Act;
- the firm's response to the Act; and
- what each of us can do to help eliminate modern slavery.

We also continue to provide additional modern slavery and human rights training for people involved in procurement. During the reporting period we developed and presented additional modern slavery training to our events team, which included examination of modern slavery risks in food industry and hotel sector supply chains and the cause, contribute and direct linkage framework set out in the UN Guiding Principles to understand how we could potentially be involved with adverse human rights impacts.

External engagement and other activities

Our Business & Human Rights practice, part of our Employment practice, provides advice and representation to enable businesses, non-profit and public sector entities to comply with all of their legal obligations in all areas relating to human rights, including working with clients at various stages of the modern slavery reporting cycle. Our pro bono practice also provides specialist advice on human rights law to a variety of clients, including non-profit entities.

The firm prepared the following reports during the Reporting Period:

- our annual ESG report which covers the steps we have taken as a firm in the areas of environment, governance, anticorruption, human rights and labour, including modern slavery;
- our second UNGC Communication on Progress, detailing our work to embed the 10 Principles into our strategies and operations; and
- as a member of the Australian Legal Sector Alliance (**AusLSA**), we report annually on topics including sustainable supply chain management.

We also responded to modern slavery questionnaires issued to us by numerous clients as part of their own modern slavery and human rights risk assessments.

How we assess the effectiveness of our actions

To assess the effectiveness of our actions:

- we compared the response rate to questionnaires for the current and previous reporting period: 61.7% of suppliers (74/120 suppliers) completed the questionnaire during the Reporting Period, compared to 61.5% of suppliers (67/109 suppliers) in the last reporting period. The response rate remained steady, noting that the size and composition of the group of suppliers surveyed varies from year to year;
- we assessed our suppliers against our risk framework to determine their risk profile/rating;
- we compared questionnaire responses and risk ratings for the current and previous reporting periods for changes in the risk profiles of suppliers and any associated trends, and identified some areas where we will work with the supplier on modern slavery awareness;
- we monitored the completion rate and feedback on the modern slavery awareness module for our people and the number of modern slavery awareness modules that we make available to suppliers. As of 30 June 2025, 1,913 of our people had completed the modern slavery awareness model since its launch in 2021; and
- we will continue to develop measures to assess the effectiveness of our actions as further social procurement and modern slavery initiatives are implemented.

Other relevant information - our next steps

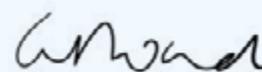
Hall & Wilcox is taking a continuous improvement approach to combatting modern slavery, including the following immediate and longer term actions:

- follow up various suppliers who did not respond to the request to complete the questionnaire as part of ongoing supplier management;
- identify suppliers requiring further due diligence and develop a program with suppliers to address potential risks, as required;
- expand our identification of potential risks of modern slavery for suppliers in tier 2 and further down the supply chain;
- continue to regularly review our policies and processes;
- expand the modern slavery controls for our suppliers and their supply chains;
- implement our selected grievance mechanism as part of our process to enable reporting and remediation;
- include provision for reporting modern slavery concerns in a whistleblower policy;
- adopt a human rights statement and broader human rights due diligence framework;
- increase our engagement with the UNGC and AusLSA, through learning and networking opportunities; and
- continue to provide further modern slavery and broader human rights training to key people, including those involved in procurement.

Consultation and Board approval

This statement was prepared by our Risk team in consultation with our broader Modern Slavery Working Group and our Pro Bono Partner. The process was inherently consultative due to the shared management and governance of the partnership and Associated Entities.

This statement was approved by the Board of Partners of Hall & Wilcox on 9 December 2025.



Graydon Dowd
Managing Partner



Emma Woolley
Chair of Partners

A leading Australian
business law firm