

# Slater + Gordon Lawyers

**Modern Slavery Statement**  
FY 2022

## About this Statement

This Modern Slavery Statement (**Statement**) is made by Slater & Gordon Ltd (ABN 93 097 297 400) and each of its wholly owned operating subsidiaries (together **Slater and Gordon**) under the *Modern Slavery Act 2018* (Cth) (**Act**) for the financial year ending 30 June 2022 (**FY 2022**).

The Slater and Gordon business operates through various legal entities. These separate entities largely reflect historical asset acquisitions, the structures of which have been retained for legal/tax/accounting purposes only.

The overall business functionality of the Slater and Gordon business is overseen by the Board of Directors and Executive Leadership Team of Slater & Gordon Ltd. The vast majority of supplier contracts are entered into by Slater & Gordon Ltd.

Accordingly, this Statement is a consolidated description of the actions taken to address modern slavery risks by the Slater and Gordon group of companies as a whole.

The Board of Directors of Slater & Gordon Ltd has reviewed and approved this Statement for publication as a joint statement of all reporting entities in the Slater and Gordon group of companies in accordance with section 14(2)(d)(ii) of the Act.

This Statement has been prepared to meet the mandatory reporting criteria set out under the Act. The table below identifies where information relating to each of the mandatory reporting criteria can be found in this Statement:

Reporting Criteria	Heading and page reference
Identify the reporting entity	About this Statement: page 1
Describe the reporting entity's structure, operations and supply chains	Our Structure, Operations and Supply Chain: page 2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity	Modern slavery risks within our operations and supply chain: page 3
Describe actions taken to assess and address these risks, including due diligence and remediation processes	Actions to assess and address modern slavery risks: page 5  Measuring our effectiveness: page 7  Looking Forward: page 9
Describe the process of consultation with entities you own or control	Consultation: page 9  Approval: page 10
Provide any other relevant information	Overview: page 2  Looking Forward: page 9

## Overview

As a law firm built on social justice values, Slater and Gordon has a long and proud history of championing the rights and entitlements of people who need our help. Slater and Gordon respects the fundamental rights of all human beings, including the right to freedom from modern slavery of any kind.

Slater and Gordon is committed to safe workplaces and to limiting the risk of modern slavery within its own business and supply chains. Slater and Gordon is also committed to continuously improving strategies to identify and mitigate modern slavery and ethical sourcing risks.

This Statement provides details of the steps we have taken to address and mitigate the risk of modern slavery both within our business and in our supply chain.

While we continue to make progress, we recognise that there is more work to be done in the eradication of modern slavery practices worldwide and therefore commit ourselves to addressing that task, recognising that it will be a continuous process of improvement. In pursuing this goal, we know that the steps we take today will help to build a better tomorrow.

## Our structure, operations and supply chain

Founded in 1935, Slater and Gordon is a leading consumer law firm providing specialist legal and complementary services in a broad range of areas, including:

- Personal Injury
- Superannuation and Insurance
- Class Actions
- Employment Law

Serving approximately 50 locations throughout Australia, the operations of Slater and Gordon are conducted primarily by Slater & Gordon Ltd (ACN 097 297 400), a public company listed on the Australian Stock Exchange.

In addition, Slater and Gordon operates through the following reporting entities, all of which are wholly owned subsidiaries and each of which is subject to the direct influence and control of Slater & Gordon Ltd:

- Slater & Gordon Lawyers (NSW) Pty Ltd (ACN 119 864 881)
- SG NSW Pty Ltd (ACN 161 483 414)
- All States Legal Co Pty Ltd (ACN 125 001 818)
- Slater and Gordon (TML) Queensland Pty Ltd (ACN 128 949 753)
- Schultz Toomey O'Brien Lawyers Pty Ltd (ACN 136 676 714)
- Conveyancing Works (Qld) Pty Ltd (ACN 127 912 074)

All subsidiaries were acquired via historical M&A activity and currently operate in “run-off” mode only, to finalise the legal matters of legacy clients (no new business is being entered into by any of these entities). Whilst the subsidiaries each have their own boards, none of the subsidiaries employ any staff directly or undertake any significant procurement activity (other than engaging professional

advisers to progress the resolution of clients' claims). The overwhelming majority of the group's procurement activity is undertaken by the head company.

Slater and Gordon's supply chain predominantly consists of goods and services acquired to assist in the delivery of legal services. By spend, our largest suppliers are our financiers, litigation funders and other professional service providers: in this regard we work in conjunction with barristers, other law firms, legal, medical and other subject matter experts who are engaged on behalf of our clients to assist with the progression of our clients' legal matters.

In addition, our supply chain includes the physical premises we occupy, facilities we use (photocopiers, office supplies, etc), branded products used for promotional purposes, maintenance contracts, software licences and IT infrastructure.

## Modern slavery risks within our operations and supply chain

As a professional services business whose workforce is employed solely in Australia, there is negligible risk of modern slavery within our direct business operations.

In terms of our supply chain, we have assessed the modern slavery risk of our suppliers by reference to the country or location in which they operate, and/or the level of risk generally attributed to the supplier's industry sector, as applicable.

As our suppliers supply goods and services which support the delivery of professional services, we consider there is minimal risk to our firm being directly linked to modern slavery practices through our primary supplier contractual relationships.

Notwithstanding the foregoing, we acknowledge that there is a risk of vulnerable workers in our indirect supply chains, a situation exacerbated by the COVID-19 pandemic, the effects of which have placed unprecedented pressure on global supply chains.



The proportion of our FY22 suppliers who are headquartered in Australia as compared to those who are headquartered overseas is presented in the chart to the left.

Of the 5000+ vendors with whom we have direct contractual relationships only 27 are located internationally, representing one half of a percent by number and a little over one percent of our total supplier expenditure in FY22.

While none of our primary suppliers were based in countries<sup>1</sup> that have higher incidences of modern slavery, it is possible that their own supply chains could include products or services

<sup>1</sup> North Korea, Eritrea and Burundi are estimated to have the world's highest rates of modern-day slavery, with India, China and Pakistan home to the largest number of victims: <https://reliefweb.int/report/world/which-countries-have-highest-rates-modern-slavery-and-most-victims>

sourced from such countries. We do not currently have any direct visibility into the supply chains of our primary suppliers but propose to undertake further analysis in future as part of the maturation of our response to modern slavery risks.

Of the Australian-based suppliers, the largest cohort consists of other professionals (ie: barristers, medical experts, cost consultants, etc.) whom we have engaged for the purposes of progressing the conduct of our clients' legal matters.

Nonetheless, we have developed risk management processes and identified those of our suppliers that might be more vulnerable to modern slavery risk thereby indirectly exposing Slater and Gordon to modern slavery practices.

The industry sectors relevant to our supply chain deemed by us to present a higher inherent risk of modern slavery were less than 3% of primary suppliers as show in the chart below. The basis of each industry's inherent risks is summarised below.

### **Cleaning services**

The cleaning services industry represents a moderate risk of modern slavery, being an industry characterised by a high prevalence of migrant labour, the low-skill nature of the work and the propensity for work to be sub-contracted.

Presence of these risk factors necessitates a higher degree of due diligence when selecting cleaning suppliers directly – to this end we have previously declined to engage suppliers who are unable to provide assurance that they will not sub-contract the work. We have less control over (and visibility of) cleaners' working conditions in circumstances where cleaning services are engaged via building management, rather than directly.

### **IT hardware**

Slater and Gordon procures a wide range of technological hardware as a necessary means of conducting business.

It is widely known that there is a higher risk of modern slavery in the technological hardware industry, as such products are typically manufactured in countries carrying a high risk of modern slavery, including forced labour, and use products that have been mined under conditions that amount to modern slavery.

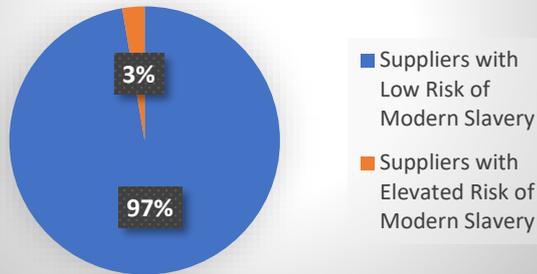
While we have no direct insight into the supply chains of the technological hardware that we procure, we are committed to working with our direct suppliers to identify the controls they have in place to mitigate the modern slavery risks in their supply chains.

### **Promotional products and stationery**

The promotional products and office stationery supply industry was identified as having higher vulnerability to modern slavery in terms of the production of those items, which tend to be low cost, and high volume, with the consequence that they tend to be manufactured in countries known to have sub-standard working conditions, including excessive hours of work and very low wage rates.

In light of the risks associated with this industry Slater and Gordon has undertaken targeted due diligence enquiries into its primary supplier of promotional products: further details of those enquiries are set out in the following section.

## Primary Suppliers' Relative Risk of Modern Slavery



In FY22 we calculated that suppliers engaged directly in those higher inherent risk industries represented less than 3% of our primary suppliers by expenditure, as shown in the chart to the left.

A breakdown of our primary suppliers by way of modern slavery risk categorisation is represented on the left.

We remain alert to those aspects of our supply chain that might be more vulnerable to modern slavery risk thereby indirectly exposing our business to modern slavery practices.

## Actions to assess and address modern slavery risks

### Ethical Sourcing and Modern Slavery Policy

Slater and Gordon has adopted an Ethical Sourcing and Modern Slavery Policy. The policy is designed to ensure that the company sources products and services in accordance with its legal obligations and in line with community expectations and its own values, while working with suppliers to prevent, mitigate and where appropriate, remedy modern slavery practices in their operations and supply chains.

The Ethical Sourcing and Modern Slavery Policy was reviewed and updated in FY22.

### Whistleblower Policy

Slater and Gordon also has a Whistleblower Policy, which is intended to facilitate both internal and external reporting of suspected unethical or illegal behaviour. Slater and Gordon's Whistleblower Policy expressly includes as a "reportable matter" breaches of the Modern Slavery Act and conduct which endangers the health, well-being or safety of any person

The Whistleblower Policy was reviewed and updated in FY22.

### Procurement Framework

Slater and Gordon has a centralised and formal procurement function, staffed by a team of dedicated procurement personnel. The procurement team works with the business to ensure that all procurement is facilitated by or with the involvement of the procurement team, in order to guide procurement in a way that ensures efficient, effective, fair and ethical sourcing of goods and services.

In FY22 we finalised our formal Procurement Policy, which applies to all employees engaged in the procurement of goods and services for Slater and Gordon and sets out the criteria by which vendors are to be selected, including an evaluation of health and safety and ethical sourcing practices.

In addition, we developed Vendor Engagement Guidelines which set out the requirements for ensuring a modern slavery risk assessment and due diligence is completed for all new and amended procurement activity with suppliers.

Throughout FY22, all new and renewing supplier contracts were negotiated to include a modern slavery clause appropriate to the supplier's maturity in addressing modern slavery risks in their business and supply chains.

Wherever possible, we use our preferred modern slavery clause, which includes rights of audit and the ability to terminate in the event of non-compliance.

### **Targeted Modern Slavery Risk Response Actions**

As noted above, suppliers providing us with cleaning services, IT hardware and promotional products and stationery have been identified by us as presenting a higher inherent risk of modern slavery.

In considering whether it would be appropriate to continue using particular suppliers in those industries, Slater and Gordon takes the following factors into consideration:

- The supplier's publicly stated commitment to transparent and continuous improvement in the identification and mitigation of modern slavery risk in their supply chains (for example, as exhibited through their ethical sourcing program and remediation policy); and
- The supplier's responsiveness and cooperation in responding to our due diligence enquiries, including their readiness to provide details of their ethical sourcing policies and standards.

### **Embedding staff awareness of modern slavery risks**

We continue to ensure that all new Slater and Gordon employees participate in an employee induction program in which they are required to review and be familiar with all corporate policies, including the Ethical Sourcing and Modern Slavery Policy and the Whistleblower Policy. All new employees are also required to complete an online course on the topic of Modern Slavery.

We have also incorporated modern slavery awareness training into the rolling categories of topics chosen each year for inclusion in the mandatory governance and compliance training assigned to all Slater and Gordon employees bi-annually. If any employee fails to undertake mandatory training this has consequences for the achievement of their KPIs and, where applicable, short term incentives.

## Measuring our effectiveness

Our progress against our goals are set out below:

Goal	Action	Effectiveness
<p>Improving our understanding of the modern slavery risks in our supply chains</p>	<p>Undertaking targeted due diligence in relation to suppliers operating within designated industries deemed to have higher vulnerability to modern slavery</p>	<p>We identified suppliers in the promotional product industry for further due diligence. Enquiries of our primary supplier of promotional products confirmed that although they had identified modern slavery risks, they were committed to transparent reporting and continuous improvement in the identification and remediation of modern slavery in their supply chains.</p> <p>We have refused to engage with cleaning suppliers who were unable to provide assurance that they would not sub-contract the work</p>
<p>Establish frameworks to guide procurement in a way that ensures efficient, effective, fair and ethical sourcing of goods and services</p>	<p>Establishment of centralised Procurement Team, staffed by dedicated procurement personnel</p> <p>Implementation of a Procurement Policy</p>	<p>The establishment of a formal procurement framework, consolidating processes, protocols and controls enables us to better assess and manage the risk of modern slavery in our business and supply chains. To this end the Procurement Policy was finalised and implemented and we also developed Vendor Engagement Guidelines.</p>

<p>Embed awareness of modern slavery risks in the business</p>	<p>Review and update the Ethical Sourcing and Modern Slavery Policy</p> <p>Incorporate Modern Slavery awareness training into the rolling categories of topics chosen each year for inclusion in the mandatory governance and compliance training assigned to all employees bi-annually (note: failure to undertake mandatory training has consequences for achievement of KPIs and, where applicable, short term incentives)</p>	<p>We reviewed and updated the Ethical Sourcing and Modern Slavery Policy</p> <p>There is an enhanced awareness among Slater and Gordon's staff of the risk of modern slavery. The procurement team, in particular, is alert to the need to address modern slavery in the supplier assessment process and incorporate appropriate contractual terms to hold vendors accountable for the management of modern slavery risks</p>
<p>Suppliers to commit to combatting modern slavery in their own operations and supply chains</p>	<p>All new and renewing suppliers are required to commit to combatting modern slavery in their own operations and supply chains</p>	<p>During FY22, all new and renewing suppliers were required, as part of the procurement process, to demonstrate their commitment to limiting the risk of modern slavery within their own businesses and supply chains.</p> <p>Wherever possible, appropriate modern slavery clauses were included in the contractual terms. Where this was not possible to negotiate, we would only engage the supplier if we were satisfied that the supplier had adopted policies and issued statements confirming their commitment to the eradication of modern slavery within their own businesses and supply chains.</p>

## Consultation

The Slater and Gordon group consists of a number of wholly owned subsidiaries sitting under the head entity, Slater & Gordon Ltd. Slater & Gordon Ltd is the only entity in the group:

- actively writing new business;
- employing staff; and
- leasing office space.

All other entities are in “run off” mode, operating only for so long as necessary to finalise the legal matters of legacy clients.

The overwhelming majority of Slater and Gordon’s procurement activity is contracted through Slater & Gordon Ltd, with the subsidiary entities only engaging directly with professional services providers where required to progress the legal matters of legacy clients (ie: barristers, medical experts, etc).

The Executive Leadership Team of Slater & Gordon provides oversight and direction for the operations of all companies in the group. The boards of the various subsidiaries are comprised of senior executives who are also members of the Executive Leadership Team.

The Ethical Sourcing and Modern Slavery Policy binds all entities in the Slater and Gordon group.

## Looking forward

In the next reporting period, we propose to further develop our response to the risk of modern slavery in our business and supply chains by undertaking the following actions:

- Undertaking a review of the effectiveness of steps we have taken in this reporting period
- Continuing discussions with suppliers identified as presenting a higher risk of the prevalence of modern slavery and re-assessing their plans to address those risks to ensure they are in line with our expectations
- Continuing to enhance employee training materials to foster awareness of modern slavery risks and the skills required to effectively identify and report on instances of risks of modern slavery, wherever they may occur in our operations or supply chain
- Completing development of a Supplier Code of Conduct

# Approval

The Board of Slater & Gordon Ltd authorised and approved the publication of this Statement on 14 December 2022 as a joint statement for all entities in the Slater and Gordon group.

Slater & Gordon Ltd confirms that is in a position to directly influence and control each reporting entity covered by this Statement, for the purposes of satisfying the approval requirements as set out in section 14(2)(d)(ii) of the Act.

Slater and Gordon is pleased to publish this FY22 Modern Slavery Statement and commits to continuing to track and publicly report on our progress in combatting all forms of modern slavery in our supply chain.

A handwritten signature in black ink, appearing to read 'John Somerville', is positioned above the printed name and title.

**John Somerville**  
**Chief Executive Officer**  
**Slater & Gordon Ltd**

15 December 2022