



# Modern Slavery Statement

FOR THE PERIOD 1 JULY 2020 TO 30 JUNE 2021

Allens acknowledges the Traditional Owners of Country throughout Australia, on whose lands we live and work. We pay our respects to Aboriginal and Torres Strait Islander peoples, their stories and their continuing cultures, and to Elders, past and present.

This statement is made and published jointly on behalf of Allens (ABN 47 702 595 758), an Australian partnership, and Allens Operations Pty Limited (ABN 87 004 992 607) as trustee for the Allens Operations Trust. References to ‘we’, ‘our’ and the ‘firm’ cover both entities.

This statement is made under section 14 of the *Modern Slavery Act 2018* (Cth) (the *Act*) with respect to the financial year ending 30 June 2021.

## **1.1 OUR COMMITMENT**

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We are committed to taking action to assess and address modern slavery risks in our operations and supply chain. In this modern slavery statement we describe the steps we have taken during the reporting period, and actions we plan to take to continually improve our approach.

Allens aims to uphold the highest standards of quality and integrity. We support and respect the protection of internationally proclaimed human rights and we are committed to providing a fair and safe workplace, where our employees are treated with dignity and respect.

Allens was a foundation signatory to the United Nations Global Compact in 2001, and continues to promote and uphold the Compact’s 10 principles including those relating to human rights and labour standards. We also seek to promote Sustainable Development Goal 8.7 in relation to the eradication of forced labour, modern slavery and human trafficking.

## 1.2 OUR STRUCTURE AND OPERATIONS

Allens is a leading international law firm providing legal services to clients in the public, private and not-for-profit sectors across a wide range of legal practice areas including:

- Corporate
- Projects & Development
- Disputes & Investigations
- Banking & Finance
- Tax
- Competition, Consumer & Regulatory
- Intellectual Property & Patent & Trade Mark Attorneys

The firm has offices in Australia (Brisbane, Melbourne, Perth and Sydney), Vietnam (Ho Chi Minh City and Hanoi) and Papua New Guinea (Port Moresby). Allens operates as a partnership in Australia. Allens is a local partnership in Papua New Guinea and the offices in Vietnam are locally licensed. Allens Operations Pty Limited is a separate service entity that provides support services to Allens' legal practice.

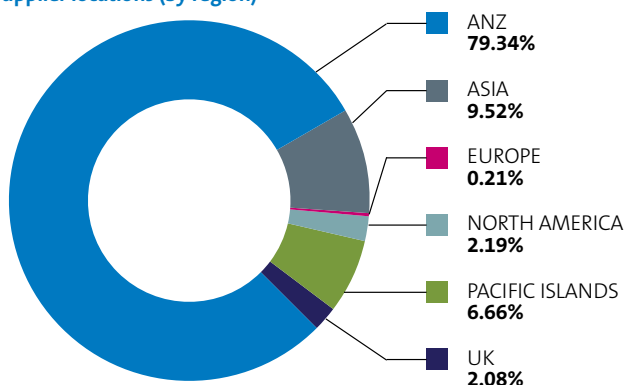
We have a total headcount of approximately 1600 people including partners, lawyers, practice support and corporate services staff. The majority of our people are employees. We engage some contract lawyers and other professional staff as part of our flexible resourcing and contract review work for clients. From time to time we engage temporary agency staff to support short-term business needs.

## 1.3 OUR SUPPLY CHAIN

We source products and services from a range of suppliers to support the provision of our legal services and the business operations of our firm.

During the reporting period, the firm procured products and services from over 900 direct suppliers<sup>1</sup>. The pie chart below shows the main regions where these suppliers are located, with approximately 80% located in Australia.

Supplier locations (by region)



1 This supplier analysis includes suppliers recorded in our invoice management system, but does not include legal services suppliers (eg, barristers, law firm agents and expert witnesses) engaged on behalf of, or for the purpose of providing advice or services to or for the benefit of third parties, and credit card spend

2 Global Slavery Index 2018 <https://www.globalslaveryindex.org/resources/downloads/>

During the reporting period, the firm's main procurement categories (by spend) were:

- business operations (including facilities and facilities management);
- information and communications technology and technology services;
- professional services (including insurance);
- knowledge services;
- human resources; and
- marketing and hospitality services (including catering).

## 1.4 IDENTIFYING AND ASSESSING MODERN SLAVERY RISKS

We apply a risk-based methodology to assess and prioritise modern slavery risks in our operations and supply chain. Our approach is informed by reputable tools including the Global Slavery Index (GSI)<sup>2</sup> and takes into account modern slavery risks associated with geographic locations, industries, types of products and services, and business models.

We have assessed the risk of modern slavery in our operations to be low. As a supplier of legal services, we operate in a highly regulated sector and have a workforce composition that is considered to be at low risk of modern slavery practices. Over 95% of the firm's employees are located in Australia, which has been assessed by the GSI as having a lower prevalence of modern slavery practices. We comply with all applicable employment legislation, and all employees have written terms of employment.

In relation to our supply chain, we have identified suppliers in certain procurement categories and geographical locations as having a potentially higher exposure to modern slavery risks. Our procurement categories at higher potential risk of modern slavery are:

- **Information and communications technology (ICT) equipment, promotional items and uniforms.** These products typically involve complex supply chains that extend into countries with higher risks of modern slavery practices. At these lower tiers of our supply chain, visibility and leverage are also more limited.
- **Facilities management (eg, cleaning and security), hospitality and catering services.** These services carry a higher potential risk of modern slavery as the workforce may include short-term and migrant workers who are considered to be more vulnerable to risks of modern slavery practices.
- **Outsourced business support and labour hire services.** Risks are heightened in this procurement category as we may have less visibility and control over workers and their employment terms and conditions.

Although the majority of our suppliers are located in Australia, we also have direct and indirect suppliers located in countries (including Vietnam and Papua New Guinea) that have been ranked by the GSI as having a higher prevalence of modern slavery risks. During the reporting period we conducted additional research to deepen our understanding of modern slavery risks in Vietnam and Papua New Guinea, including by reference to reputable indices and non-governmental organisation reports, and in consultation with employees in Vietnam and Papua New Guinea.

## 1.5 ADDRESSING MODERN SLAVERY RISKS

The firm has a policy framework to ensure we provide a fair and safe workplace for our employees, and to guide our approach to mitigating modern slavery risks in our operations and supply chain. Relevant policies and procedures include:

- Ethics Code;
- Workplace health and safety policy;
- Inclusion and diversity policy;
- Grievance policy;
- Whistleblowing policy;
- Responsible sourcing processes; and
- Supplier Code of Conduct.

We have implemented firm-wide responsible sourcing processes with the aim of ensuring that our procurement practices are ethical, and environmentally and socially responsible. Our responsible sourcing processes include the following actions to address potential risks of modern slavery that we have identified in our operations and supply chain.

### (a) Due diligence

We have a Supplier Code of Conduct to clearly communicate the standards we expect of all of our suppliers, including with respect to human rights and labour practices. The Code is published on our website, and is available in English and Vietnamese.

For direct suppliers assessed to be at higher risk of modern slavery, we:

- (i) conduct desktop screening checks in relation to modern slavery risks and practices; and
- (ii) request written confirmation that suppliers understand and are able to meet the minimum standards in the firm's Supplier Code of Conduct.

We also have a responsible sourcing questionnaire, including questions relating to modern slavery risk factors, which we may use to supplement our supplier due diligence process.

### (b) Training and capacity building

We provide education and training to employees to build awareness of modern slavery risks, and capacity to apply the firm's responsible sourcing processes.

Tailored training sessions are provided to employees with procurement responsibilities in all of our offices, covering the firm's modern slavery risk assessment and due diligence procedures, and indicators of modern slavery. We also incorporate information about modern slavery and the firm's responsible sourcing processes in the induction training program for new recruits.

We have an online responsible sourcing portal for employees, including:

- (i) information about modern slavery and modern slavery warning signs;
- (ii) tools and resources to assist with the assessment and mitigation of modern slavery risks, including a seven question framework for guiding procurement decisions; and
- (iii) details about the firm's grievance mechanisms for raising workplace and modern slavery concerns.

We also invite external speakers to present to staff, and we publish information in the firm's internal communication channels, to encourage responsible sourcing practices.

During the reporting period, approximately 300 employees completed training or attended an awareness raising event relating to modern slavery.

### (c) Remediation and grievance mechanisms

We provide a number of mechanisms for employees and contractors across all of our offices to raise concerns about unacceptable behaviour, including in relation to potential modern slavery risks. Our internal processes are supplemented by an independent and confidential platform that can be used for reporting concerns.

In our Supplier Code of Conduct we require suppliers to provide their workers with a mechanism to confidentially report grievances without fear of penalty, reprisal or harassment.

### (d) Additional actions during reporting period

During the reporting period, we implemented the following additional actions, with the aim of continually improving our approach to addressing modern slavery risks in our operations and supply chain.

- (i) Commenced a process of meeting with key direct suppliers in higher risk procurement categories (with an initial focus on ICT equipment, promotional items and facilities management) to:
  - increase visibility and better understand risk mitigation measures at lower tiers of our supply chain; and
  - identify opportunities for knowledge sharing and process improvements.
- (ii) Developed guidance materials for employees in relation to the responsible sourcing of promotional items and garments.
- (iii) Commenced the development of a suite of modern slavery template clauses for use in contracts with

suppliers. Where possible, we will include these clauses in new supplier contracts, and when current supplier contracts are renewed.

- (iv) Developed and launched a Modern Slavery and Responsible Sourcing e-learning module for employees, which includes information about modern slavery risk factors and indicators, the firm's responsible sourcing processes and steps to take if a suspected situation of modern slavery is identified.
- (v) Continued to formalise escalation procedures and develop our response and remediation processes in the event that an incident of modern slavery is identified in our operations or supply chain.
- (vi) Continued to take into account new and heightened modern slavery risks and supply chain impacts as part of the firm's broader response to the Covid-19 pandemic.
- (vii) Reviewed and updated the firm's employment agreements to ensure compliance with all applicable employment legislation.
- (viii) Commenced a review of the firm's Grievance Policy and mechanisms for raising concerns, and refreshed employee awareness of the channels available through firm-wide communications and online resources.

## 1.6 EVALUATING EFFECTIVENESS OF OUR ACTIONS

During the reporting period, no instances of modern slavery were identified or reported through the firm's due diligence processes or grievance mechanisms.

To evaluate the effectiveness of our firm-wide actions to assess and address modern slavery risks, we will continue to monitor the following quantitative indicators on an annual, and cumulative basis:

- (a) suppliers that were sent a copy of our Supplier Code of Conduct, and that confirmed they understood and met the standards in our Code;
- (b) desktop screening checks conducted; and
- (c) employees who have completed training or attended an awareness raising event relating to modern slavery.

Our new Modern Slavery and Responsible Sourcing e-learning module includes an assessment that will enable us to test understanding and evaluate the effectiveness of the training.

We have initiated a Modern Slavery and Responsible Sourcing working group comprising senior representatives from the firm's Business Operations, Office of General Counsel, Finance, Information Technology, Marketing & Client Services and People & Development teams. The purpose of the working group will be to support operational implementation, monitor progress and assess the effectiveness of the firm's responsible sourcing processes.

## 1.7 FUTURE ACTION

We aim to continually strengthen and improve our approach to assessing and addressing modern slavery risks in our operations and supply chain and we have identified the following key areas of focus for future action:

- (a) **Risk assessment and due diligence**
  - (i) Continue to regularly review our risk assessment approach to address any new and emerging modern slavery risks and priorities, and changes to our procurement spend and supplier base;
  - (ii) Continue to engage with direct suppliers in higher risk procurement categories to better understand processes that suppliers have in place to assess, address and remediate modern slavery risks within their supply chains and to identify opportunities for collaboration and knowledge sharing; and
  - (iii) Continue to integrate the assessment and mitigation of modern slavery risks into procurement templates and onboarding processes for new suppliers.
- (b) **Training and awareness raising**

Continue to support and build the capacity of employees with procurement responsibilities to apply the firm's responsible sourcing processes through training and the development of relevant tools and resources.
- (c) **Remediation and grievance mechanisms**

Continue our review of the firm's grievance mechanisms, and provide further training and awareness raising initiatives for employees and contractors in relation to the available options.

## 1.8 ADDITIONAL INFORMATION

Through the firm's pro bono program we contribute to addressing some of the factors that exacerbate risks of modern slavery. Our lawyers provide free legal assistance to a large number of vulnerable individuals without adequate access to publicly funded access to justice, including asylum seekers and people experiencing homelessness.

We work closely with a range of human rights organisations to provide this assistance, including the Human Rights Law Centre, ACRATH and refugee and immigration legal services. During the reporting period we provided pro bono legal representation to a number of extremely vulnerable clients seeking to recover wrongfully withheld wages.

## 1.9 GOVERNANCE AND CONSULTATION PROCESS

The Boards of Allens and Allens Operations Pty Limited are responsible for the oversight and approval of the firm's modern slavery statement. Day-to-day operation of the firm's responsible sourcing program, including our modern slavery response, is managed by the firm's Community Engagement Team and is overseen by the firm's Community Engagement Board (chaired by the firm's Managing Partner). The firm's newly formed Modern Slavery and Responsible Sourcing working group will support operational implementation, monitor progress and assess the effectiveness of the firm's responsible sourcing processes.

A wide range of stakeholders from Allens and Allens Operations Pty Limited were consulted in relation to our approach to assessing and addressing modern slavery risks and the preparation of this statement. The stakeholders include members of the firm's Office of General Counsel, Finance, People & Development, Business Operations, Information Technology and Marketing & Client Services teams, and relevant staff from the firm's Vietnam and Papua New Guinea offices.

Members of the Board of each reporting entity were given an opportunity to consider and provide comments on the statement prior to approval and publication.

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Describe the structure, operations and supply chains of the reporting entity.	1.1 Our commitment 1.2 Our structure and operations 1.3 Our supply chain
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	1.4 Identifying and assessing modern slavery risks
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	1.5 Addressing modern slavery risks
Describe how the reporting entity assesses the effectiveness of these actions.	1.6 Evaluating effectiveness of our actions
Describe the process of consultation with any entities that the reporting entity owns or controls.	1.9 Governance and consultation process
Provide any other relevant information.	1.7 Future action 1.8 Additional information

The Allens Board approved this statement on 11 November 2021 and the Board of Directors of Allens Operations Pty Limited approved this statement on 25 November 2021.

### Signed By:



**Fiona Crosbie**  
Chair, Allens



**Rod Fielding**  
Director, Allens Operations Pty Limited

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