Modern Slavery Statement 2022/2023

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This Modern Slavery Statement (Statement) is given jointly by MinterEllison (ABN 91 556 716 819) and Minter Ellison Services Pty Ltd (as trustee for the Minter Ellison Services Trust) (ABN 55 971 237 295) and covers certain Australian affiliated entities and other entities we own or control and businesses we operate, including MinterEllison Consulting and MinterEllison Consulting Pty Ltd. Any references to "we", "us", "our" or the "firm" are references to the two reporting entities and the entities they own and control.

This Statement has been prepared in accordance with the requirements in the *Modern Slavery Act 2018* (Cth) for the reporting period 1 July 2022 to 30 June 2023. It was approved by the MinterEllison Partnership Board on 29 November 2023 and the Minter Ellison Services Pty Ltd Board on 3 December 2023.

MinterEllison

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MinterEllison's purpose and values

We are an Australian based law firm and our purpose is to create sustainable value with our clients, our people and our communities. Our values include excellence in all its forms, curiosity and innovation to help solve complex challenges for our clients and our business, and working collaboratively with each other and our clients.

These values underpin our approach to how we work with our people, our clients and our community to ensure they have a consistent experience that reflects our purpose and values. We strive to create an inclusive workplace environment which nurtures wellbeing and sustainability. Our environmental, social, and governance (ESG) framework is centred on ensuring our responsible business policies and processes set the context for sustainable management practices in our operations and our supply chain. Our approach to governance across the firm is grounded by our focus and commitment to accountability and transparency, again a reflection of our core values.

We make this Statement as a further commitment to fulfilling our purpose. Reducing the risks of Modern Slavery as that term is defined under Australian law in our operations and supply chain is one of the many ways we seek to positively impact our clients and the people who are directly and indirectly involved in our firm's business. We also engage with our clients, our people and the community by publishing articles and conducting training to raise awareness about Modern Slavery and the Modern Slavery Act 2018 (Cth) (**Modern Slavery Act**).

With a strong commitment to continuous improvement and a preparedness to undertake the work necessary to minimise the risk of Modern Slavery in our operations and supply chain, we outline in this Statement our firm's current approach, and future commitments to understanding, identifying, addressing and transparently reporting on our Modern Slavery risks.

Our structure and operations

MinterEllison is a partnership led by Chief Executive Officer and Managing Partner, Virginia Briggs and the Executive Leadership Team. The Partnership Board, chaired by Andrew Rentoul provides oversight and guidance to the firm's Leadership Team.

The MinterEllison Partnership provides a full range of corporate and commercial legal services to our clients which span both private and Government sectors across various industries. In addition to our core legal services, MinterEllison operates a number of complementary businesses, including MinterEllison Flex addressing temporary legal and related resourcing needs.

Further, Minter Ellison Services Pty Ltd, acting as trustee of a services trust supports our internal operations.

We also offer an integrated suite of consulting services through the MinterEllison Consulting Partnership (ABN 50 017 469 292) via MinterEllison Consulting Pty Ltd, covering technology, cyber security, tax, risk and regulatory, infrastructure and information technology.

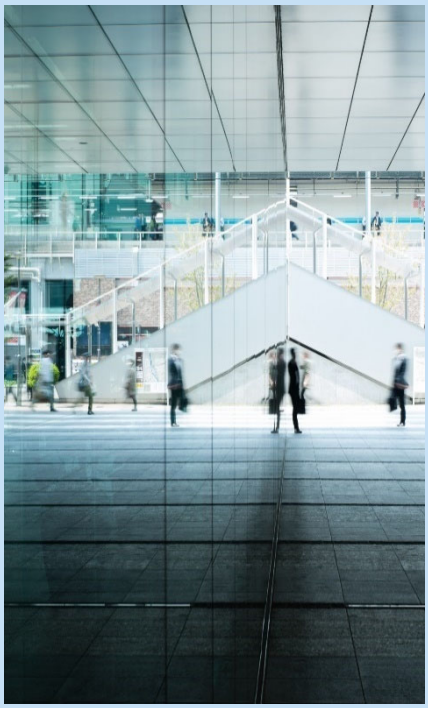
(All entities referred to in this Statement will be collectively referred to as **MinterEllison**).

MinterEllison has a dedicated team of over 2,400 people working in Sydney, Melbourne, Brisbane, Canberra, Perth, Adelaide, Darwin, London and in representative offices in Shanghai and Beijing.

MinterEllison also works with a network of associated entities in New Zealand, Asia, and on the Gold Coast, including MinterEllison LLP (Hong Kong), MinterEllison RuddWatts (New Zealand) and MinterEllison Gold Coast. These associated entities are operationally aligned with MinterEllison but not financially integrated.

Our supply chain

As a professional services firm, our principal activities involve the provision of legal and consulting services to our clients. We require certain goods and services to conduct our operations and deliver our services to our clients.

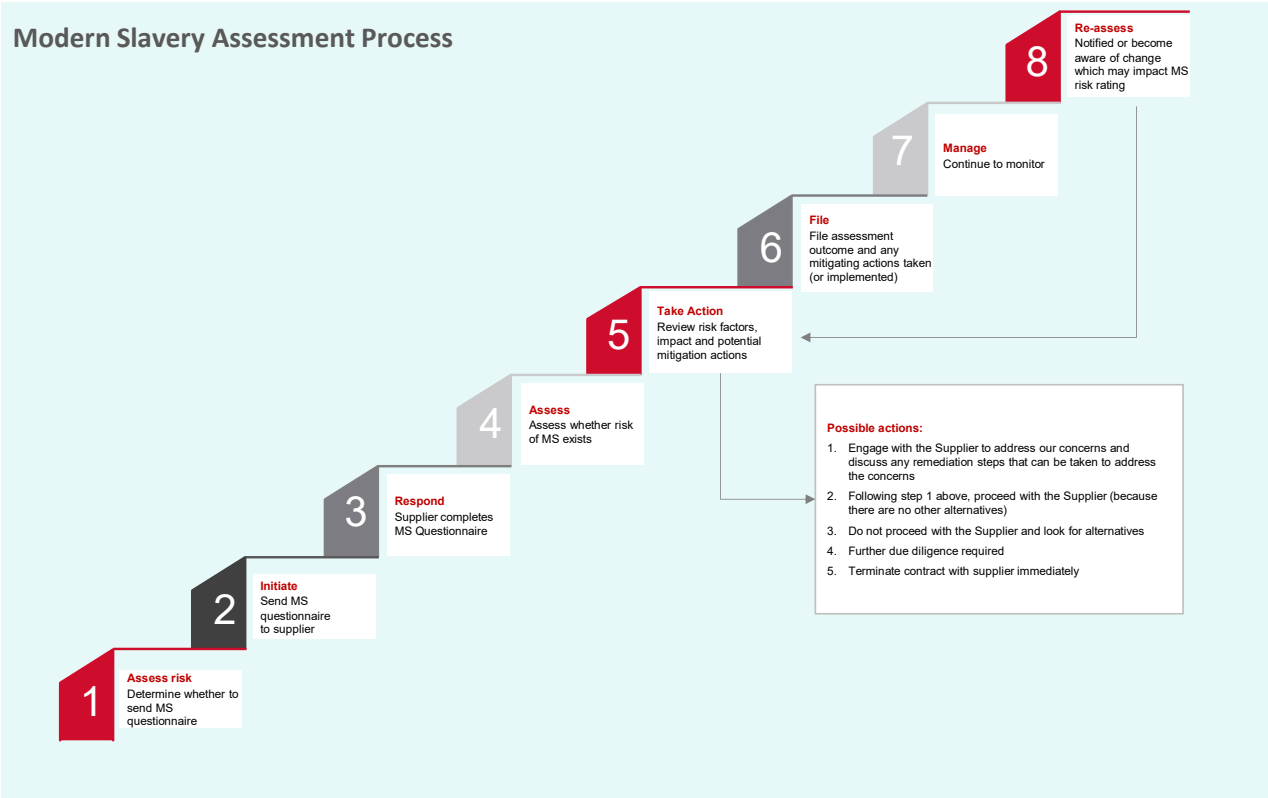


The majority of goods and services we procure come from suppliers based in Australia (which is a country with a low prevalence of Modern Slavery according to the Walk Free Foundation's Global Slavery Index).

The main categories of goods and services that we procure (directly and indirectly) are:

- **Information and communications technology (ICT):**
  This includes computer hardware and software, cloud services, virtual data room services, virtual document exchange services, printers, audio/visual equipment and services, desk phones and mobile phones.
- **Business services:**
  This includes supply of our office furniture and fit outs, stationery and branded items, knowledge subscription services, document archiving and management services and courier/postal services as well as printer maintenance services and document printing services.
- **Professional services:**
  This includes taxation, external legal counsel, consulting services and professional and personal development, and wellbeing training programs.
- **Office facilities management:**
  The services that we use to maintain our offices, include leasing, office maintenance services, utilities, cleaning and security, waste management, recycling, office fit-outs and office relocation services.
- **Mobility and travel:**
  This includes vehicle and airplane travel bookings and accommodation bookings.
- **Hospitality and catering:**
  This includes onsite and offsite catering and events.
- **Business labour support functions:**
  This includes recruitment services for our business and our Flex resourcing to meet temporary legal and related resourcing needs.

Assessment of Modern Slavery risks



We recognise that Modern Slavery is a global problem affecting every country of the world which requires a co-ordinated response from governments and businesses alike. In our approach to Modern Slavery, we have taken guidance from:

- the Commonwealth *Modern Slavery Act 2018* – Guidance for Reporting Entities developed by the Department of Home Affairs;
- the UN Guiding Principles on Business and Human Rights which sets the standard for countries and companies to prevent, address and remedy human rights abuses committed in business operations; and
- target 8.7 under the UN Sustainable Development Goals which sets a global goal to take action to eradicate forced labour and end Modern Slavery.

We understand that Modern Slavery is an umbrella term that includes a range of serious exploitative practices and labour rights abuses, such as human trafficking, debt bondage, forced labour and child labour. While poor labour practices such as substandard working conditions or underpayment of workers may not meet the legal definition of Modern Slavery on their own, we understand these forms of exploitation are high risk factors that may lead to Modern Slavery over time. Modern Slavery can also occur in any industry, at any point in the supply chain, but is often hidden within the supply chain and so can be difficult to detect.

High risk industries identified in the Australian Council of Superannuation Investors Modern Slavery Report[1] for financial services supply chains, which are relevant to MinterEllison's business, include IT procurement, logistics and property and building services, such as facilities management, utilities, cleaning, waste management and security, print and promotional goods. High risk geographies include conflict-affected zones, and countries where there is a weak rule of law or high corruption. Countries where the workforce includes a large number of migrant workers, and where third-party employment agencies are widely used, also present a higher risk of forced labour.

We also recognise the red flags that can contribute to the creation of conditions or circumstances that make individuals more vulnerable to exploitation potentially resulting in Modern Slavery, including:

- complex and long supply chains with many intermediaries;
- supply chains which are heavily reliant on migrant workers; and
- companies using their market dominance to exert pressures on their suppliers to reduce costs.

[1] ACSI-Modern-Slavery-Report.Feb19.pdf

Approach to risk assessment

We apply a risk based methodology to assess Modern Slavery risks in our operations and supply chain. Our risk assessment methodology is developed taking into account a range of risk factors, including risks associated with geographic locations, industries, types of products and services and business models.

Our processes and approaches are monitored and informed by our Modern Slavery Working Group which was established in FY20, comprising partners and representatives from our legal, risk and business operations (including procurement and information technology) teams (**Working Group**). The Working Group is responsible for implementing the firm's Modern Slavery Action Plan with oversight and guidance provided by the Modern Slavery Steering Committee (**Steering Committee**) which reports to the MinterEllison Partnership Board.

The Steering Committee advises the MinterEllison Partnership Board on:

- the strategic direction of MinterEllison's approach to Modern Slavery risk minimisation;
- the form of the firm's annual Modern Slavery Statement; and
- the development and implementation of the Modern Slavery Action Plan.

The Steering Committee comprises the Chief Risk Officer (**CRO**), the Chief Operating Officer, the Chief Community Officer, the General Counsel and our partners specialising in Modern Slavery.

In FY23, we further developed our governance structure by introducing Charters for our Steering Committee and Working Group.

Operations

We have established procedures to ensure MinterEllison adheres to relevant employment laws in our business operations. We enter into employment contracts with our employees and service agreements with our contractors. Our commitment to having a fair and transparent workplace extends to ensuring we meet minimum wage standards, which applies to those protected by the Legal Services Award 2020, and any other relevant awards within our workplace.

We are dedicated to creating a culture and atmosphere where our people are encouraged to voice their concerns or grievances without retaliation. The specific procedures for doing so can be found in our established workplace policies and processes.

Based on our investigations and our risk assessments during the reporting period in our operations, we consider we are overall at **low risk** of Modern Slavery as a legal and consulting firm. However, we acknowledge the importance of ongoing monitoring and vigilance to identify any emerging Modern Slavery risks.

Supply Chain

We assess the Modern Slavery risks associated with our suppliers through a process that includes both quantitative and qualitative methods. This evaluation includes the use of a Modern Slavery Questionnaire (**Questionnaire**). We have developed a risk assessment matrix tool which we apply across our supplier Questionnaires which raise 'red flags' for factors including: the location of the business or service; where the product is made/developed; the location of where post-sale services will be carried out; subcontractor arrangements; composition of workers; types of labour; existence of Modern Slavery Statements, related policies and procedures in the supplier's business; number of employees; compliance with our Procurement Compliance Standards; and independent certifications.

In addition to our Questionnaire based assessments, we monitor our suppliers through other sources, including industry reports, company profiles, and online research. This approach helps us investigate and address potential Modern Slavery risks among our suppliers.

Our data capture and reporting processes also identify instances where suppliers decline to complete our online Questionnaire for review purposes. If a supplier declines to complete our online Questionnaire, we undertake further a risk assessment process, including an analysis of the information provided by the supplier (including their own Modern Slavery Statement, any relevant policies they supply and information available from their website) and our own information sources to evaluate the level of Modern Slavery risk associated with the particular supplier.

To ensure prompt action when medium or high Modern Slavery risks are identified during our assessments, MinterEllison has established an escalation process designed to respond quickly and effectively to any identified risks arising from either the supplier's Questionnaire responses or our other enquiries. This process applies to risks identified through supplier Questionnaire responses or other inquiries.

Our Procurement team is required to bring the identified risk and related concerns to the Chief Risk Office for confirmation and review of the risk assessment. Subsequently, further due diligence may be conducted, which may involve obtaining additional information from or about the supplier in relation to the identified risks. If the concerns remain, the Procurement team will communicate them to both the Chief Risk Officer and the product/purchase sponsor and proceed to implement our response and remediation plan.

Supply Chain- ICT Suppliers

We have previously identified that the Information and Communications Technology (ICT) sector poses higher levels of risk of forced labour in specific regions. Additionally, there is a general scarcity of public information on ICT

supply chain management, particularly concerning the sourcing of materials and components used in ICT hardware. Therefore, there continues to be an inherent risk that procurement of ICT hardware is linked to Modern Slavery practices, most prevalent in the raw material extraction, manufacturing and disposal stages.

We monitor ICT risks in our supply chain by assessing the risk profile of our ICT suppliers, including software providers, by requiring our suppliers to complete our online Questionnaire and conducting investigations through various sources, including industry reports, company profiles, and online research as outlined above.

We assess our ICT suppliers' responses to our Questionnaire by using our Modern Slavery risk assessment matrix tool and follow the processes outlined above.

Several of our ICT suppliers are headquartered in or have engaged subcontractors (for example a global support model that included post-sale services) in countries with a higher prevalence of Modern Slavery, according to the Walk Free Foundation's Global Slavery Index, including India and the Philippines. However the application of our risk assessment methodology to the Questionnaire responses from those ICT suppliers completing Questionnaires in FY23 produced no medium or high risk ratings.

Therefore, our assessment is that our overall risk of causing or contributing to Modern Slavery through our procurement of ICT goods and services is **low**.

However, despite this scoring, we recognise that the risk of being directly linked to Modern Slavery is higher where the ICT supplier is based in, or sources or manufactures product or labour from a country associated with a higher prevalence of Modern Slavery.

Supply chain- Other non ICT suppliers

During FY23, we continued to use our Questionnaire to engage with non-ICT suppliers, including suppliers which take part in our competitive tender process.

We also continued to perform a risk based assessment of our non-ICT suppliers against a range of Modern Slavery risk indicators as outlined above.

In regard to the identification and escalation of risks for our non-ICT suppliers, we follow the same processes as for ICT suppliers.

Regarding non-ICT suppliers, the application of our risk assessment methodology to the Questionnaire responses from those non-ICT suppliers completing Questionnaires in FY23 produced no medium or high risk ratings during the reporting period.

As a result, we assess that our overall risk of causing or contributing to Modern Slavery through the procurement of non-ICT goods and services is **low**. Nevertheless, we recognise that the risk of being directly linked to Modern Slavery is higher where the non-ICT supplier is based in, sources or manufactures product, or uses labour from a country associated with a higher prevalence of Modern Slavery.

Summary

While we have not identified any additional factors indicating a change in the risk profile for our supply chain compared to the previous reporting period, we recognise the landscape of Modern Slavery risks is constantly evolving. Consequently, we are committed to regularly reviewing and refining our risk assessment methods.

This commitment involves closer engagement with our ICT and non-ICT suppliers, with a focus on those operating in high-risk regions and those sourcing or manufacturing products or using labour from countries associated with a higher prevalence of Modern Slavery.

We are also dedicated to maintaining vigilance and proactively monitoring potential risks, as well as staying well-informed about industry developments.

MinterEllison policies

Our assessment of the risk of Modern Slavery in our operations and supply chain has been carried out against the background of our existing policies and procedures aimed at ensuring a safe and fair working environment for our people and our suppliers. These policies, which are reviewed and updated on a regular basis in order to improve our practices, include:

- **Anti-Bribery and Anti-Corruption**

  Consistent with our culture of trust, integrity and fairness, this policy outlines a zero tolerance for bribery and corruption.

- **Workplace Behaviour** including Discrimination, Harassment, Sexual Harassment and Bullying.

  This policy applies to

  – all our operations and covers our policies and procedures relating to workplace behaviour; and
  – discrimination, harassment, sexual harassment and bullying.

- **Code of Conduct**

  This sets out how all members of our firm must conduct themselves to uphold our values and deliver on our purpose to create sustainable value with our clients, our people and our communities.

- **Diversity and Inclusion**

  This policy aims at leveraging our diversity through nurturing a culture of inclusion and collaboration to deliver a workplace experience for our people consistent with our values.

- **Work Health, Safety and Wellbeing**

  This policy outlines our commitment to building a safe workplace and summarises the important rights and obligations in relevant work health and safety legislation.

- **Responsible Procurement Policy and Compliance Standards**

  We recognise that we have a significant opportunity to drive positive social, economic and environmental outcomes through the approach we take to procuring goods and services. This commitment underpins our Responsible Procurement Policy and models MinterEllison's support for sustainable ways of working.

  Our Responsible Procurement policy seeks to ensure that the goods and services we purchase through our supply chain are:

  – delivering value for our business, our clients and our communities;
  – consistent with, or at a minimum reflect the ethical commitment set out in the principles of the UN Global Compact; and
  – consistent with our commitment to full and fair opportunity.

- **Whistleblower Policy**

  This policy sets out the procedures and reporting channels available to our people to report unethical or illegal conduct relating to the firm's operations. The policy also explains the whistleblower protections available and how reports may be made anonymously (if preferred). This is a key policy supporting the firm's **Speak Up** program available to all members of our firm.

- **Sustainable ways of working and flexible work**

  This policy sets out our approach and expectations towards sustainable ways of working to help build a culture where all of our people feel trusted, supported and able to create sustainable value for our clients, our people and our communities.

Summary of our actions in FY23 to assess and address Modern Slavery risks

Small Suppliers

Some smaller suppliers which are not required to comply with the Modern Slavery Act told us they did not feel they needed to complete our Questionnaire. Other smaller suppliers were answering Modern Slavery questions for the first time. In those situations, the Procurement team offered to support them if they had questions while completing the Questionnaire. To help small suppliers which lack resources to understand Modern Slavery risks, we developed an easy to understand information sheet (**Modern Slavery Guide**) and short form questionnaire which will be released in early 2024 to our small ICT and small non-ICT suppliers.

Cleaning services

Another potential Modern Slavery risk we have identified through our risk assessment processes is in sectors where a large portion of people are paid the minimum wage, or are migrant workers. These sectors include accommodation services, office premises cleaning services and hospitality and catering services.

We recognise cleaning services may be at higher risk of Modern Slavery abuses with the potential for low skilled and migrant workforces presenting opportunities for exploitation and layers of subcontracting also obscuring labour conditions. These types of services may be indirectly procured by the firm through outsourcing and third party contracting arrangements.

In FY22, we conducted an investigation into contracted cleaning services in all our Australian office locations. The aim was to gain a deeper understanding of potential risks and to assess ongoing initiatives within the commercial property sector related to cleaning services and Modern Slavery risks.

In FY23, we continued our engagement and monitoring of Modern Slavery risks with our landlords. This monitoring included our premises cleaning providers. Our offices, with the exception of Darwin, are all within buildings owned or managed by top-tier office landlords or agents, from whom we source much of these services. In Darwin, our landlord is a family run corporation. We have continued to engage with all of our landlords to ensure they and their sub-contractors undertaking work for our benefit complete our Questionnaire. Our ongoing efforts reflect our commitment to addressing and mitigating Modern Slavery risks within our operations and supply chain.

In FY24, we will continue to engage with our landlords on Modern Slavery risks in premises related services within their supply chains.

Updating our Supplier Contracts

We have updated our supplier contracts to include Modern Slavery provisions. The risk rating of the supplier determines which wording we include in the supplier contract. If the supplier tries to resist our wording, this is then escalated to the Chief Risk Officer and General Counsel for determination.

Refining our processes

We focused on engaging with suppliers in the tender process, prior to onboarding or contract renewal to undertake Modern Slavery risk assessments and promote ethical practices in our supply chain.

We also continued to develop our escalation processes to respond promptly and effectively to any identified risks arising from either our Questionnaire or other enquiries. This includes the implementation of our response and remediation plan.

Training and Education of our people

We have provided training to our Procurement team to ensure they understand the risks and visible indicators regarding Modern Slavery.

Our Digital/ICT services team received a tailored Modern Slavery information briefing in January 2023, based on the educational briefing provided to our Modern Slavery Working Group in December 2022. We organised a Modern Slavery training session for our Business Operations Team (which comprises almost half our firm) in May 2023. The session was recorded and made available to the whole firm through our Modern Slavery and Procurement SharePoint site.

In June 2023, the Commonwealth Report on the Modern Slavery Review was shared by our Office of General Counsel and the Working Group to the business and our Modern Slavery experts in MinterEllison shared information about the Commonwealth Report in a client newsletter in May 2023.

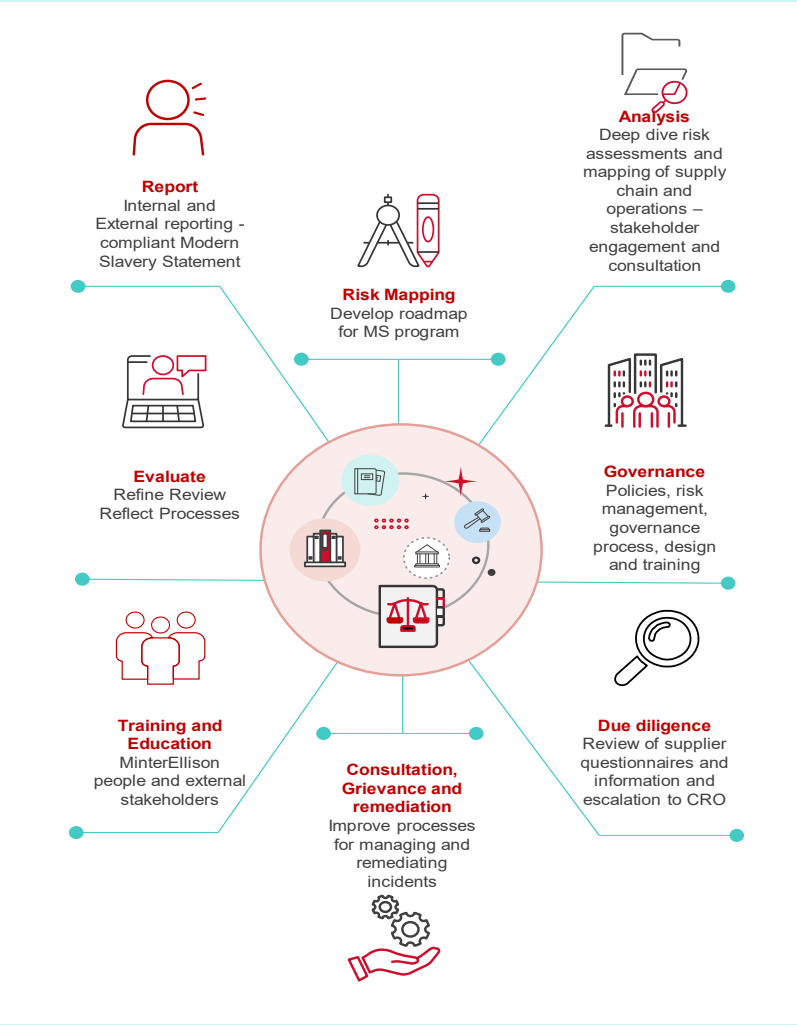
Speak Up Portal and other reporting

We have made available a portal known as '**Speak Up**' as an option for our people to be able to report:

- unacceptable workplace behaviours;
- improper or illegal conduct;
- bribery and corruption;
- unethical conduct or professional misconduct; and
- unsafe work practices.

Suppliers are also able to report any concerns to MinterEllison by contacting meprocurement@minterellison.com.

Our approach to Modern Slavery Risk Assessment and Mitigation



Summary of actions to assess and address Modern Slavery risks

During FY23, we carried out all of the future actions proposed in our FY22 Statement as detailed above in the 'Assessment of Modern Slavery risks' section and summarised in the table below:

Proposed action	FY23 actions
Continue reviewing and refining our risk assessment process of suppliers to better identify risk and strengthen our supplier engagement around Modern Slavery	We have continued to refine our risk methodology and processes for addressing Modern Slavery risks in our operations and supply chain. We focused on engagement with the suppliers in the tender process, prior to onboarding or on contract renewal. We are investigating the use of software solutions and external data subscriptions to further automate parts of our supplier risk assessment processes.
Improve our supplier data capture processes for our procurement activities within MinterEllison in order to continuously improve our operations and supply chain risk assessment processes.	We have continued to develop the Procurement page on the firm's intranet, including a link to further information and resources relating to Modern Slavery. We have also commenced a review of our data capture and analysis process to improve insights and escalation triggers and expect a refined process to be implemented in FY24.
Continue to require our suppliers to adhere to our Responsible Procurement Standards (or equivalent standards provided by supplier).	This work is ongoing and includes the development of the new Modern Slavery Guide for small suppliers.
To increase utilisation of Modern Slavery risk mitigation tools developed by the Working Group.	We have continued to apply our Modern Slavery risk mitigation tools and find ways to integrate them into the firm's procurement framework.
Review premises procurement practices and continue engagement with landlords and service providers in relation to Modern Slavery risks.	We are continuing engagement with our landlords on Modern Slavery risks and we have integrated Modern Slavery related clauses into MinterEllison's supplier contract templates. Our office procurement strategy now requires our landlords to include minimum standards around cleaning contracts in particular compliance frameworks that can deliver effective assurances on Modern Slavery risks to our business.
Conduct additional firm-wide training to increase awareness of Modern Slavery risks.	During FY23, we provided education and training sessions to our Business Operations teams firmwide. The session was recorded and made available to the whole firm through our Procurement SharePoint intranet site which was developed for our people to build their awareness of Modern Slavery risks and of the firm's Procurement Compliance Standards. We are also developing a dedicated Modern Slavery intranet site with resources including learning modules which will be launched in FY24 Q1. In FY24, we are planning further training and education sessions to be offered to our legal and consulting teams. We are also planning to introduce Modern Slavery resources and material for all new recruits as part of their firm induction program in 2024.

Proposed action	FY23 actions
Develop tools to assist smaller suppliers who lack resources to understand Modern Slavery risks, including by providing digestible information sheets.	We developed a new Modern Slavery Guide and Questionnaire for our small suppliers which contains a one page overview of Modern Slavery issues and MinterEllison's commitment to combatting Modern Slavery in its business operations and supply chain and a more limited series of Modern Slavery questions for our small suppliers to answer in an effort to educate smaller suppliers about Modern Slavery and ensure basic compliance with our Procurement Compliance Standards as a precursor to including such vendors in our supply chain. We expect to launch this resource in early 2024.
Continue to identify ways to raise awareness of our grievance mechanisms with potentially affected stakeholders.	We have a number of internal mechanisms and the anonymous Speak-Up portal for our people to raise concerns about unacceptable conduct, including in relation to Modern Slavery related issues. This portal is the subject of a 12 month review to examine its effectiveness and determine if it is feasible to be used externally by contractors and other third parties to raise concerns about Modern Slavery risks. We also have a dedicated Procurement email address for suppliers to contact us.
Continue to engage and collaborate with relevant external stakeholders to share good practice.	We have prepared a report to our clients on Professor McMillan's *Report for the Review of the Modern Slavery Act 2018*. Membership of the AusLSA Legal Sector Alliance enabled our people to participate in Modern Slavery round-table discussions with experts and share high level insights with other legal firms.
Monitor the Federal Government's review of the Modern Slavery Act and review the firm's policy and processes on Modern Slavery taking into account the outcome of the review.	People responsible for MinterEllison's Modern Slavery practice have monitored the Commonwealth Government's review of the *Modern Slavery Act 2018* and distributed the *Report for the Review of the Modern Slavery Act 2018* internally to key stakeholders. This report makes thirty recommendations for change that we will be closely monitoring in the next reporting period.
To develop and implement a remediation plan to address any findings of Modern Slavery practices in our supply chain.	We have developed a response and remediation plan which is being piloted by the procurement and risk teams to ensure Modern Slavery findings or concerns are addressed promptly. We are undertaking a review of this process in FY24 to identify opportunities to enhance our approach and the plan.
Other actions during reporting period.	In addition to the proposed actions set out in our FY23 Action Plan: We allocated ongoing responsibility for leading the development of our work to address Modern Slavery risk to our Chief Community Officer as we recognise that this work is a key component of our firm's ESG commitment. This work requires an integrated multi-disciplinary approach informed by our Modern Slavery legal specialist advisors, risk team, procurement and reporting functions. Following the appointment of the Chief Community Officer as the person responsible for Modern Slavery work at MinterEllison, the step was taken to refresh our internal governance structures to clearly delineate roles and accountability between our Modern Slavery Working Group and Modern Slavery Steering Committee. The Chief Community Officer is a member of both our Modern Slavery Working Group and Modern Slavery Steering Committee.

Assessing the effectiveness of our actions

Our actions to assess and address Modern Slavery risks were overseen by the Working Group which met regularly to:

- review our Modern Slavery risk assessment methodology;
- monitor progress against the program of actions planned for the reporting period;
- approve and monitor the implementation of new and updated internal resources concerning Modern Slavery; and
- share insights and new developments in Modern Slavery reporting under the Modern Slavery Act.

Updates were provided to the MinterEllison Partnership Board on the progress of MinterEllison's processes and actions for identifying and addressing Modern Slavery risks and since May 2023 to the Modern Slavery Steering Committee.

The actions the Working Group undertook during FY23 contributed to the following improvements in our engagement with our suppliers and the ways in which we assess and address Modern Slavery risks:

- we continued to refine our risk methodology and processes for addressing Modern Slavery risks in our operations and supply chain. As part of this, we are investigating the use of software solutions and external data subscriptions to further automate parts of our supplier risk assessment process, improving the accuracy and efficiency of our risk assessment methodology;
- we focused on in-depth engagement with the suppliers in the tender process, prior to onboarding or on contract renewal;
- we identified opportunities to better understand sector specific risks, for example through the ongoing engagement with our landlords on Modern Slavery risks in premises related services within their supply chains;
- we further developed understanding of our suppliers, their operations and supply chains, through their responses to the Questionnaire and through our investigations and engagement efforts;
- we increased formalisation and centralisation of the firm's procurement process, record keeping and management of suppliers; and
- we refined internal escalation processes to ensure identified risks and concerns are brought to the attention of our Chief Risk Officer and the product/purchase sponsor and our response and remediation plan is followed.

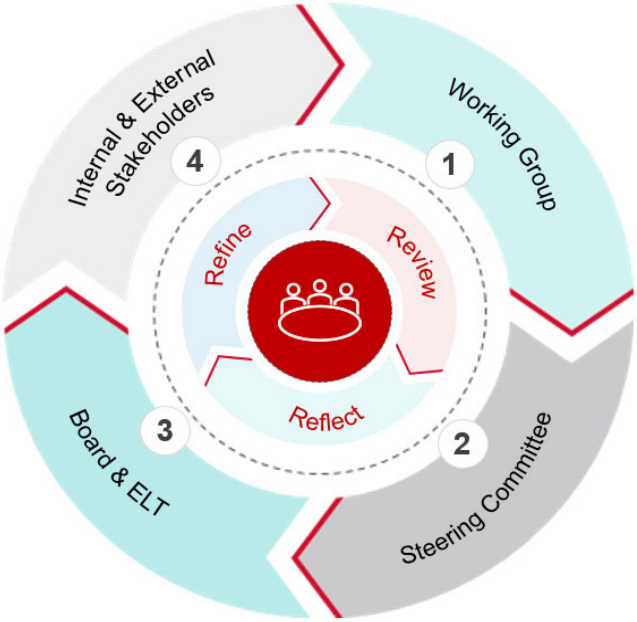
Consultation

The Statement was prepared by the Modern Slavery Working Group with the guidance of the Modern Slavery Steering Committee. The Steering Committee includes partners who lead our firm's Modern Slavery risk management practice, General Counsel, Chief Operating Officer, Chief Risk Officer and Chief Community Officer. The Working Group includes members of our Risk, Procurement, ICT and other Business Operations leaders as well as client practice group specialists with deep knowledge of our Firm's supply chain. The Working Group develops, reviews and implements the Modern Slavery Action Plan and prepared this Statement.

MinterEllison also consulted with its owned and controlled entities in the development of this Statement. The Steering Committee referred the Statement to the MinterEllison Consulting Partnership, MinterEllison Consulting Pty Ltd and MinterEllison Services Pty Ltd for feedback, which led to an open discussion on the reporting requirements and the future actions of continuous improvement.

The Statement was reviewed by the Executive Leadership Team, prior to formal approval by the MinterEllison Partnership Board and Minter Ellison Services Pty Ltd.

Commitment to continuous improvement: future initiatives



With our focus on continuous improvement and building on the knowledge gained from our due diligence and risk assessment, our plan is to take the following actions during our subsequent reporting periods to reduce the risk of Modern Slavery in our supply chain:

- continue to monitor the Federal Government's response to the review of the Modern Slavery Act and review the firm's policy and processes to address Modern Slavery taking into account the recommendations of the review and emerging Modern Slavery risks and priorities;
- review our premises procurement processes and continue engagement with landlords with a focus on cleaning, security, waste management and recycling contracts in relation to Modern Slavery risks;
- conduct additional firm-wide training to increase awareness of Modern Slavery risks and legislative developments, including by-stander training;
- improve our supplier data capture processes for our procurement activities within the firm in order to further improve our operations and supply chain Modern Slavery risk assessment processes;
- review supplier responses to our Modern Slavery Questionnaires and reflect and refine our Questionnaire based on Modern Slavery risks, our procurement spend and our supplier profiles;
- continue to require our suppliers to adhere to our Procurement Compliance Standards or equivalent standards. We will also review and enhance the material available on our website for our suppliers regarding our commitment to Modern Slavery and our expectations of suppliers;
- review and improve our processes for ongoing monitoring of our suppliers and their supply chains to better identify Modern Slavery risks and strengthen our engagement with suppliers in this regard. This includes closer scrutiny of the sources of products and services provided by our suppliers, particularly those suppliers sourcing from high risk countries. For instance, although our overall risk assessment for ICT suppliers is low, we are planning to reassess our due diligence procedures for ICT suppliers operating in or sourcing from higher-risk countries and make the necessary adjustments as needed;
- investigate the use of software and external data subscriptions to automate our risk assessment of suppliers and improve our risk assessment methodology to ensure it remains effective and aligned with industry standards and global trends and research;
- continue to identify ways to raise awareness of our grievance mechanisms with potentially affected stakeholders internally and externally, and consider and further develop mechanisms whereby our suppliers and their people may be able to raise concerns to us and provide input on the effectiveness of the tools and resources provided and their Modern Slavery risks;
- continue to engage and collaborate with relevant external stakeholders, experts and other law firms to share good practice;
- review and where necessary, update our Modern Slavery related policies;
- agree the next iteration of our response and remediation plan; and
- continue to review, reflect and refine all of our Modern Slavery risk processes to ensure we maintain a continuous improvement process and are adapting to changing conditions.

Statement approval

This Statement was approved by the Boards of each of the two reporting entities covered by this Statement.

This Statement was approved by the MinterEllison Partnership Board in its capacity as the principal governing body of MinterEllison on 29 November 2023. This Statement is signed by Andrew Rentoul in his role as Chairman of the MinterEllison Partnership Board and Virginia Briggs in her role as Chief Executive Officer and Managing Partner on 6 December 2023.

Andrew Rentoul

Chairman of the Partnership Board of MinterEllison

Virginia Briggs

Chief Executive Officer and Managing Partner of MinterEllison

This Statement was approved by the Board of Minter Ellison Services Pty Ltd in its capacity as the principal governing body of Minter Ellison Services Pty Ltd on 3 December 2023. This Statement is signed by Peter Coats in his role as director of Minter Ellison Services Pty Ltd on 6 December 2023.

Peter Coats

Chairman of the Board of MinterEllison Services Pty Ltd

Mandatory criteria

This Statement addresses the mandatory criteria for a Modern Slavery statement outlined in section 16 of the Modern Slavery Act. The below table indicates where each requirement is addressed in this Statement.

	Criteria	Page Number
(a)	Identify the reporting entity.	4
(b)	Describe the structure, operations and supply chains of the reporting entity.	4
(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.	5-9
(d)	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.	10-12
(e)	Describe how the reporting entity assesses the effectiveness of such actions.	12
(f)	Describe the process of consultation on the development of the statement with any entities that the reporting entity owns or controls (if a joint statement has been made under section 14, also describe the process of consultation with the entity giving the statement).	13
(g)	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	13