



Holding Redlich

Modern Slavery Statement



This Modern Slavery Statement (Statement) is made jointly by the Holding Redlich Partnership (ABN 15 364 527 724) and Justice Services Pty Ltd, as Trustee for the Justice Unit Trust (ABN 45 128 258 564). References to 'we', 'us', 'our' or the 'firm' are references to those entities. This statement sets out the steps that we have taken to ensure that modern slavery and human trafficking is not taking place within our operations or our supply chains. This statement is made pursuant to the Australian Modern Slavery Act 2018 with respect to the financial year ending 30 June 2020.

This statement was reviewed and approved by our Executive Committee on behalf of Holding Redlich and the Directors of Justice Services Pty Ltd on 31 March 2021.



INTRODUCTION

Holding Redlich is committed to respecting human rights and believes there is no place for modern slavery within the operations of any ethical business. We are joining the challenge to combat modern slavery by working to guard against this practice in our own supply chains and operations.

Modern slavery refers to cases of serious exploitation, including where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Modern slavery impacts men, women and children and includes situations where individuals are forced to work against their will under threat.

This statement affirms Holding Redlich's dedication to the highest ethical standards and sets out the approaches we are taking to reduce the risk of modern slavery practices within our supply chains and operations, in accordance with the *Modern Slavery Act 2018*.

OUR STRUCTURE AND OPERATIONS

Holding Redlich is a partnership. It is a law firm led by our National Managing Partner, Ian Robertson and the Executive Leadership Team. We have offices in Melbourne, Sydney, Brisbane and Cairns. We also operate out of a number of suburban offices in Victoria for our personal injury practice, trading under the name of Adviceline Injury Lawyers.

The Holding Redlich Partnership is owned by the partners of the firm. Justice Services Pty Ltd is the trustee of the Justice Unit Trust (**Justice Services**). Justice Services provides support services to the Holding Redlich Partnership in accordance with a services agreement between both entities. Justice Services employs all non-legal staff and attends to the administration associated with Holding Redlich (i.e. premises leases, utilities, purchasing, printing and stationary, asset leasing, payroll, etc.). As a professional service firm, our principal activity is the provision of legal services to our clients. As the practice is regulated, our people are required to conduct themselves to specific standards applicable in the jurisdictions in which we operate including, but not limited to, the legal profession legislation and regulation in each relevant Australian state.



The firm's business services functions including: finance; marketing; operations; human resources; information technology; knowledge management and precedents are run by our National Business Services Managers who report to our Chief Executive Officer. Our Chief Executive Officer, in turn, reports to our National Managing Partner.



OUR SUPPLY CHAIN

Our supply chain predominantly consists of goods and services purchased by our offices to enable our people to deliver legal services to our clients. The sourcing and purchasing of goods and services is undertaken by each office and is supported by a centralised finance department.

The majority of goods and services that we procure come from suppliers based in Australia. We do not regularly source goods or services internationally. The main categories of goods are services that we procure (directly and indirectly) include:

- **Information and communications technology:** 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.
- **Office services:** this includes supply of our office furniture and fitouts, stationary and branded items, knowledge subscription services, document archiving and management services and courier and postal services as well as printer maintenance and document printing services.
- **Professional services:** this includes taxation, external legal counsel, consulting services and professional development, training providers and employee programs.
- **Mobility and travel:** this includes domestic and international travel bookings and accommodation bookings.
- **Hospitality and catering:** this includes onsite and offsite catering and events.



OUR POLICIES

We have policies that address our approach to the identification of modern slavery risks and the steps to be taken to prevent modern slavery and human trafficking in our business operations. These include:

Anti-bribery Policy

The purpose of this policy is to establish controls to ensure that Holding Redlich fully complies with all applicable anti-bribery and corruption regulations, and to ensure that Holding Redlich's business is conducted in a socially responsible manner. Holding Redlich has a culture based on mutual respect and honesty and has policies in place to ensure that we operate in an ethical and fair manner with our colleagues and clients. This applies to all our partners, consultants, contractors and employees, as well as associated third parties such as suppliers, and sets out rules with regard to minimising risks of bribery and corruption.

Whistle-blower Policy

At Holding Redlich we value that our firm is based on a culture of trust, honesty and ethical behaviour. Our firm's policies emphasise the importance of speaking up as a critical component of our values. Whistleblowing refers to a partner or employee speaking out about an activity which they believe violates ethical or legal norms. It can be defined generally as the honest disclosure of information in the public interest about serious wrong doing in an organisation to an authority which can bring about an investigation and remedy the situation. The firm has engaged an external consultant, Deloitte, to provide a confidential hotline service that accepts calls or emails from Partners or employees wishing to report possible illegal, unethical or improper conduct.





ASSESSMENT OF MODERN SLAVERY RISKS

As part of our commitment to eliminating modern slavery, Holding Redlich has taken the following steps as part of the preparation and publication of our first annual modern slavery statement. Our Business Risk Group, a subcommittee of the firm's Risk Management Committee has established a Modern Slavery Committee to implement our Modern Slavery Action plan.

As part of that plan Holding Redlich has commissioned Edge Environment Pty Ltd (**Edge**) to undertake a Modern Slavery Risk Assessment. Edge will undertake a modern slavery risk assessment of the firm's operations and supply chain using its in-house tool, which is underpinned by the Social Hotspot Database (see www.socialhotspot.org). The analysis will rank procurement categories according to inherent modern slavery risk as well as by spend and will summarise the hotspots and their drivers.

Other actions taken by Holding Redlich include:

- our website will be updated to contain the latest copy of our modern slavery statement
- Holding Redlich will formally establish a Code of Conduct in 2021 which includes guidance on business relationships, and summaries each of our policies referred to above, and can be provided to our suppliers and staff
- we place an emphasis on value rather than price in our procurement decisions
- we place an emphasis on sourcing from local suppliers, including Aboriginal and Torres Strait Islander associations, businesses and peoples
- where we do procure outsourced services, the delivery locations for those services are rated as low risk for modern slavery being locations primarily in Melbourne, Sydney, Brisbane and Cairns.

In the event that we discover a case of modern slavery within our supply chain, we will first seek to work with the supplier to implement corrective and remedial action (including appropriate training). Only where appropriate, will we seek to terminate our agreement with them.

ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

In order to assess the ongoing effectiveness of its measures to combat modern slavery, Holding Redlich will also take the following steps:

- we audit our policies relevant to modern slavery on a regular basis to assess performance against established industry benchmarks, and update them as required
- we provide annual training to staff responsible for supply chain management on modern slavery risks and combative measures
- we conduct periodic reviews of our organisation and supply chain structures and assess whether there are any changes to the level of risk of modern slavery.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

As this is our first reporting period, the focus has been on establishing the systems and methods to assess our modern slavery risks. When our Modern Slavery Risk Assessment has been completed we will be able to analyse and rank those high risk procurement categories and create actions to specifically address those risks.

In future reporting periods, we will assess the effectiveness of our actions by:

- conducting an annual review of our Modern Slavery Risk Assessment including evaluating the findings from the risk assessments and identify any high risk suppliers to better inform our understanding of the areas of modern slavery risk in our supply chain
- engage an online training provider and a mandatory training module will be deployed to Partners and employees in 2021, to ensure our people have a clear understanding of (and ability to identify) forms of modern slavery and human trafficking, as well as how to combat them
- monitor the number of people who have undertaken this training
- review feedback from those people who have responsibility for procurement to ensure they can implement risk mitigation tools and identify high risk areas.



EXTERNAL ENGAGEMENT

We understand the importance of collaborating with other organisations and the sharing of good-practice on modern slavery and human trafficking. Our specialised lawyers have an active role in advising, training and updating our clients in relation to modern slavery risks in their businesses.

CONSULTATION

This statement was prepared by our Modern Slavery Subcommittee, reporting to the Holding Redlich Executive Committee. The Statement was reviewed and approved by our Executive Committee on behalf of Holding Redlich and the Directors of Justice Services Pty Ltd on 31 March 2021.

Signed by:



Ian Robertson

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