



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 (ABN 15 005 249 874). 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 2024.

This statement was reviewed and approved by the Executive Committee of Holding Redlich in its capacity as principal governing body of Holding Redlich and the Directors of Justice Services Pty Ltd on 6 December 2024.



ACKNOWLEDGMENT OF COUNTRY

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

ABOUT THIS STATEMENT

This Modern Slavery Statement (Statement) is made by:

- the Holding Redlich Partnership (ABN 15 364 527 724)
- Justice Services Pty Ltd (ABN 15 005 249 874)
- the following wholly owned entities: Justice Unit Trust (ABN 45 128 258 564), Expedite Consulting Australia Pty Ltd (ACN 654 647 757), Expedite Legal Technology Pty Ltd (ACN 654 647 784) and Expedite Learning Pty Ltd (ACN 654 647 766).

References to 'we', 'us', 'our' or the 'firm' are references to those entities. This statement has been prepared in consultation with all entities that our Partnership owns or controls. All actions referred to within this statement have been completed by all 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 2024.

This statement was reviewed and approved by the Executive Committee of Holding Redlich in its capacity as principal governing body of Holding Redlich and the Directors of Justice Services Pty Ltd on 6 December 2024.

INTRODUCTION

Holding Redlich is committed to upholding human rights and firmly believes that there is no room for any form of modern slavery within the operations of any ethical business, particularly a business whose focus is on providing access to justice. We continue the fight against modern slavery by applying best practice principles to ensure ethical and responsible procurement in our supply chains and operations. Extending to our suppliers and clients, we have set high standards and clear expectations about the way we conduct our business.

This statement, our fourth, prepared pursuant to the requirements of the Modern Slavery Act 2018 (Cth) (Act) is in respect of the year 1 July 2023 to 30 June 2024 (Reporting Period). It expands and draws on our previous statements and extends our sophistication and 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.

This modern slavery statement addresses each of the mandatory criteria in section 16 of the Act, as outlined in the table below.

Mandatory criteria for modern slavery statements	Page of this Statement
Identify the reporting entity	2
Describe the reporting entity's structure, operations and supply chains	3, 4
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	4, 5
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	5, 6
Describe how the reporting entity assesses the effectiveness of these actions	7
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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.



OUR STRUCTURE

Holding Redlich is a leading independent national law firm providing innovative commercial legal advice with the resources and expertise of around 500 staff, including 184 lawyers and over 50 partners across our offices in Melbourne, Canberra, Sydney, Brisbane and Cairns. We also operate out of several suburban offices in Victoria for our personal injury practice, under the trading name of Redlich's Work Injury Lawyers (formerly Adviceline Injury Lawyers). As a law firm, Holding Redlich operates as a partnership, led by our National Managing Partner, Troy Lewis, and our Executive Committee. The Executive Committee manages the strategic direction of the Firm.

The Holding Redlich Partnership is owned by the partners of the firm, and operates under the trading name, Holding Redlich. Justice Services Pty Ltd (Justice Services) is an operational entity that 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).

The firm's business services functions including: finance; marketing; operations; human resources; information technology; knowledge management, quality and risk, 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 and Executive Committee.

Holding Redlich has also established a number of wholly owned entities established to deliver specific professional services, including Expedite Consulting Australia Pty Ltd, Expedite Legal Technology Pty Ltd and Expedite Learning Pty Ltd.

OUR VALUES

Holding Redlich's legal practice is underpinned by a promise to uphold human rights and promote social justice. Consistent with our values and culture, we are strongly committed to pro bono and community work, to support access to justice for the most disadvantaged and vulnerable and minimising our impact on the environment. Integrity, confidentiality, ethics and trust are at the core of everything we do.

Holding Redlich is also a member of the Australian Legal Sector Alliance (AusLSA), and we align with their goals of promoting best practice sustainable and inclusive workplaces, community support, environmental conservation and responsible governance which includes sustainable procurement and modern slavery commitments.

Holding Redlich recognises the importance of giving back to the communities in which we operate and making our firm as sustainable as is possible. We aim to implement best practice environmental, social and governance policies and initiatives. We prioritise the purchase of goods and services from social enterprises, including Supply Nation certified businesses. We are also committed to Putting Australia first by engaging local consultants and contractors.

OUR OPERATIONS

As a professional service firm, we provide expert legal services to our clients. The professional services sector is amongst the lowest at risk of engagement in modern slavery. The conduct of our lawyers is regulated by the legal profession legislation and regulations in each Australian state or territory in which we operate and we have a high level of control over our direct operations. Therefore, we consider the risk of modern slavery occurring within our organisation to be very low.

As our operations are based only within Australia, the majority of our suppliers are staff and consultants which we engage or retain in Australia. We comply with all applicable Australian labour laws regarding working conditions and remuneration. We have a well-established human resources framework to ensure compliance with these laws and a range of policies and management practices in place to support our operations. We therefore consider the risk of causing modern slavery in our operations to be very low.

Given Holding Redlich's unique position providing expert legal advice to a wide variety of client in a number of industries, the firm has both the opportunity and impetus to strengthen our client's approach to modern slavery and human rights which will in turn support the legitimacy of our modern slavery advisory services.





OUR SUPPLY CHAINS

Operating in the professional services sector, Holding Redlich procures goods and services for the purpose of managing and delivering legal services. The sourcing and purchasing of goods and services is undertaken by each office and is supported by a centralised finance department.

Most 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: 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



Real estate and related property management services: rental and facilities management and office fitouts



Office services: including the supply of our office furniture and fitouts, stationery and branded items, knowledge subscription services, document archiving and management services and courier and postal services as well as equipment maintenance and document printing services.



Professional services: taxation, external legal counsel, consulting services and professional development, training providers and employee programs



Memberships and subscriptions: including professional organisations and knowledge resources



Financial and Insurance services: banking and brokerage services



Mobility and travel: domestic and international travel bookings and accommodation bookings



Hospitality and catering: onsite and offsite catering and events.

OUR RISK AREAS

Holding Redlich's core operations are delivered by staff employed or engaged in Australia. We comply with all applicable Australian labour laws regarding working conditions and remuneration, with a range of policies and management practices in place to support operations.

We consider the risk of modern slavery in our operations to be very low due to our commitment to operating in compliance with our human resources framework, as a result of Modern Slavery Risk Assessment and our ongoing engagement with our suppliers.

We have not identified any specific instances of modern slavery and our analysis has found that most tier one suppliers pose a low overall risk of modern slavery. However, we recognise that there is a risk that we, like other businesses, may be directly linked to the modern slavery practices of other entities deep within our supply chain, including entities with which we do not have a direct contractual relationship.

We consider that our supply chains present a higher risk of modern slavery than our core operations.

As part of our commitment to eliminating modern slavery, during the reporting period, Holding Redlich has taken positive steps towards obtaining a deeper understanding of the risk of modern slavery in our supply chain and combating these risks. This includes:

- sharing our Supplier Code of Conduct with our suppliers
- updated our modern slavery framework
- published information on our intranet page
- included details in the firm's website to facilitate and support discussions and queries related to modern slavery from third parties.

We have identified six categories of our supply chain which have a high potential of modern slavery risk within their supply chains. This does not imply that modern slavery risk is inherent in these products and services but prompts a proportional level of due diligence required to identify and manage risk at the supplier and contract level.

We have more opportunity to influence change with suppliers we have leverage and long-term relationships with. For this reason, we have prioritised the three categories in red that represent focus areas for more targeted due diligence measures but also present opportunities to use our buying power to generate social value above and beyond the value of the goods or services being procured.





Office Renovations and office equipment

During the Reporting Period our procurement in this category related mainly to office fit-outs. We recognise that the subcontracting of base-skill labour is a factor that heightens the risk of modern slavery in this category.

During the reporting period Holding Redlich Melbourne office moved locations. A focus of the new office fit out was to engage quality architects and builders who were aware of the modern slavery risks within their industry and have policies and controls in place to reduce the risks including:

- identification and evaluation of slavery risk within their supply chains including implementation of systems that their contractors and suppliers were primarily based in Australia, and adhered to anti-slavery standards including not employing vulnerable workers and providing compliance documentation
- we recognise the risks in the materials and labour used in manufacturing processes, and the possible high-risk geographic location of their manufacture. We prioritise procurement from local manufacturers, particularly of finished goods such as loose furniture and workstations, and we intend to prioritise procurement of locally or Australian produced raw building materials by our builders/ subcontractors in future construction projects, wherever possible.

Information and communications technology

There is a risk of modern slavery in the manufacture and assembly of electronic devices such as laptops, keyboards, mice and headsets commonly used in professional service businesses in jurisdictions that have poor labour conditions and/or use child labour.

Modern slavery risks are most pervasive in the raw material extraction, manufacturing and disposal stages that are known to attract vulnerable populations in high-risk countries. Our visibility of these risks relies on suppliers providing information on their standards and risk management and compliance systems.

We procure most of these goods and services from multinational IT companies whose modern slavery statements are publicly accessible. In the case of smaller sized suppliers we require those suppliers to become a signatory to our Supplier Code of Conduct (Code).

Cleaners

We are aware that there is an increased risk of modern slavery among labour hire providers of unskilled workers such as those involved with cleaning. We have limited visibility in this space as the cleaners are procured by our property managers under our tenancy arrangements. We have not identified any modern slavery misconduct in this area within our supply chains.

Accommodation, food, entertainment

This category includes hospitality and catering services used for our events. We must consider that providers in this sector may also rely on base-skill labour procured through outsourcing arrangements and that food industry supply chains have a high risk of modern slavery.

OUR ACTIONS TO ASSESS AND ADDRESS POTENTIAL MODERN SLAVERY RISKS

Our Modern Slavery Committee - Clear lines of reporting

Our governance structure and policies provide the foundation for our response to modern slavery risks. They ensure responsibility for managing modern slavery risks are clearly allocated across business units and enable us to take a consistent and strategic approach. Our Modern Slavery Committee is responsible for determining and implementing our modern slavery response. It comprises representatives from Operations, Finance, Risk and Compliance and internal expertise in Modern Slavery and draws on a range of expertise across the firm, it continues to work to implement and improve our compliance with modern slavery obligations.





Supporting Policy Commitment

Our firm has clear policies that all employees must comply with that support the objectives of the Modern Slavery Act, including:

- **Anti-bribery Anti-corruption Policy** - establishes controls to ensure that Holding Redlich fully complies with all applicable anti-bribery and corruption regulations, and to ensure that our business is conducted in a socially responsible manner
- **Whistle-blower Policy** - whistleblowing refers to a partner or employee speaking out about an activity which they believe violates ethical or legal norms. The firm has engaged an external consultant, to provide a confidential hotline service that accepts calls or emails from Partners or employees wishing to report possible illegal, unethical or improper conduct. The firm is considering opening access to this service to third parties including suppliers
- **Code of Conduct** - the Holding Redlich Code of Conduct brings together all the policies which specify the behaviors we expect of one another and expectations we have in our people.

Supplier minimum requirements

We expect all our suppliers to comply with applicable laws, including modern slavery legislation and laws regarding working conditions and remuneration. Through our engagement with Edge Environment Pty Ltd (Edge), we undertook a Modern Slavery Risk Assessment to identify external suppliers who may be at higher risk of modern slavery within their operations. We have engaged directly with those higher risk suppliers to ensure that they meet the necessary standards to combat modern slavery.

To ensure compliance we requested suppliers whom we identified as being our high-risk suppliers (tier one suppliers) who do not lodge their own Modern Slavery Statement, to become a signatory to our Code. Our Code, based on the Responsible Business Alliance Code of Conduct 7.0 effective 1 January 2021, sets out the minimum standards of behaviour we require of our suppliers. It includes a set of social, environmental and ethical industry standards which has been prepared with reference to international norms and standards including the Universal Declaration of Human Rights, ILO International Labour Standards, OECD Guidelines for Multinational Enterprises and ISO and SA standards. Our Code is applicable to all contract suppliers. Suppliers are expected to not only comply with the Code but to also implement this Code in their own supply chain.

External engagement and other activities

Holding Redlich provides expert legal advice to help our clients develop an approach to human rights that integrates with their operations, objectives and brand, while adhering to international human rights standards and best practice. We provide advice and representation to enable businesses to comply with their legal obligations in all areas relating to human rights, including working with clients at all stages of the modern slavery reporting cycle. Our pro bono practice also provides specialist advice on human rights law to a variety of clients, including non-profit entities.

As a member of the Australian Legal Sector Alliance, an industry-led group promoting best practice in sustainability across the legal sector, we report annually on key issues, including sustainable supply chain management.

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





HOW WE ASSESS THE EFFECTIVENESS OF OUR ACTIONS

Holding Redlich's modern slavery framework includes compliance and regulatory reporting to assess the effectiveness of our actions to assess and address risks of modern slavery. In 2023 we drew upon our previous engagement with Edge who assisted in preparing a Gap & Opportunity analysis and a Responsible Sourcing Framework.

Developed in accordance with the Act, the Responsible Sourcing Framework guides employees in purchasing goods and services with the aim of performing thorough due diligence and safeguarding vulnerable individuals within supply chains. This included the creation of a Due diligence Tool to be applied to new suppliers and proposed remediation processes going forward.

We collect information and assess risk in relation to:

- the country of origin of suppliers
- the country of operations, materials and resources
- the sector or industry where they primarily operate.

To date, our due diligence has not revealed evidence of modern slavery that requires remediation. However, we remain vigilant.

OUR NEXT STEPS

Supplier onboarding

Supplier onboarding is an important step in addressing potential modern slavery. Holding Redlich is committed to reducing the supply chain modern slavery risk. To achieve this Holding Redlich will conduct Human Rights due diligence with all suppliers with actions relative to their modern slavery risk level. Our Due Diligence tool helps us understand risk of each supplier and explains the next actions the purchaser (or account manager) needs to take to manage the risk and create positive opportunities.

In 2023 we commenced utilising the Due Diligence tool when onboarding major suppliers. The tool assists in collecting information and assess risk in relation to:

- the product or service being procured
- the anticipated spend
- the country of origin of the product.

The process for choosing an appropriate supplier includes ethical, social, and environmental evaluation with the aim to choose business partners that share the firm's values. Where appropriate, the firm will consolidate its supply chain while introducing ethical procurement policies and procedures that are robust, adaptable, and inclusive of ethical business processes.

Based on the risk assessment conducted in the reporting period, Holding Redlich's primary focus in the next reporting period will be:

- extending capability across the organisation
- refining our supplier due diligence process.

The above steps ensure that, while onboarding new suppliers, the firm consistently requests and obtains modern slavery statements and/or other information to assess the risk of modern slavery, including forced labour, in suppliers' supply chains.

Remediation process

Held over from the previous period in the next reporting period we aim to implement a remediation process, which is a critical component of Holding Redlich's response to modern slavery risks within our organisation and supply chain. This will provide a framework of actions required to safeguard individuals, remediate harm and address root causes of human rights violations. The process will align to our internal grievances systems as the recommended next steps to take when indicators of serious exploitation are uncovered. As remediation of modern slavery always requires a collaborative response from industry groups, law enforcement and survivor support services, our approach identifies key stakeholders alongside each step.

Aligning with the United Nations Guiding Principles, our response will be proportional to the severity of impacts to people (or potential impacts) and our firm's relationship to harm (whether we have caused, contributed to or are directly linked to the issues).

While this framework provides a guideline to help inform action, remediating modern slavery harm is context specific and an appropriate response will depend on the circumstances of each case and the interests of the stakeholders involved.





CONSULTATION AND STATEMENT APPROVAL

The reporting entity for the purpose of this statement is the Holding Redlich Partnership, (N A Ackroyd & Others ABN 15 364 527 724) and Justice Services Pty Ltd (ABN 15 005 249 874). This statement and all actions referred to in have been completed by both Holding Redlich and business services representatives of Justice Services Pty Ltd.

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 as principal governing body of Holding Redlich and the Directors of Justice Services Pty Ltd on 6 December 2024.

Signed by:

Troy Lewis

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