



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 2022.

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 16 December 2022.



INTRODUCTION

Holding Redlich is committed to respecting human rights and believes there is no place for modern slavery in the operations of any ethical business. We have joined the fight against modern slavery by working to ensure we apply 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.

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

Holding Redlich is a national commercial law firm with offices in Melbourne, Canberra, Sydney, Brisbane and Cairns. We also operate out of a number of suburban offices in Victoria for our personal injury practice, under the trading name of Redlich's Work Injury Lawyers (formerly Adviceline Injury Lawyers). We comprise more than 500 people, including 70 partners. As a law firm, Holding Redlich operates as a partnership, led by our National Managing Partner, Ian Robertson, and our Executive Committee.

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.).

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 VALUES

Holding Redlich's legal practice is underpinned by a strong commitment to human rights and social justice. We have a longstanding commitment to working pro bono to support access to justice for the most disadvantaged and vulnerable. Integrity, confidentiality, ethics and trust are at the core of everything we do. At Holding Redlich we are committed to creating an environment that values the contribution of all our partners and staff.

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





OUR OPERATIONS

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 or territory.

As our operations are based only within Australia, the majority of our suppliers are staff and consultants we engage or retain are in Australia. We have a well-established human resources framework of policies and procedures to ensure compliance with labour laws regarding their working conditions and remuneration, with 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.

OUR SUPPLY CHAINS

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, 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:** 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.

ASSESSMENT AND ACTIONS TO ADDRESS MODERN SLAVERY RISKS

Our Modern Slavery Committee, overseen by our Risk Management Committee, continues to work to implement and improve our compliance with modern slavery obligations. 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.

We expect all 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 have undertaken a Modern Slavery Risk Assessment to identify those 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 have requested those suppliers whom we have 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 Supplier Code of Conduct (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.

Holding Redlich considers the risk of modern slavery in our operations to be very low as due to our commitment to operating in compliance with our human resources framework (as described above) and as 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.

Other actions taken by Holding Redlich in the reporting period include:

- continuing to place an emphasis on value rather than price in our procurement decisions
- continuing to place an emphasis on sourcing from local suppliers, including Aboriginal and Torres Strait Islander associations, businesses and peoples.

In the event that we suspect or 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.

In order to assess the ongoing effectiveness of its measures to combat modern slavery, Holding Redlich continues to 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 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.

STAFF CAPABILITIES

In the reporting period, staff responsible for procurement and supply chain management were required complete modern slavery awareness and action training to better understand the risks of modern slavery in respect of our supply chains. As part of the roll out of our Code, we invited our suppliers to engage with us to understand and combat the risk of modern slavery within their own supply chains.

Over recent years, our Partners and employee solicitors who are experts in the field of modern slavery legal requirements have worked with our clients to help them meet their legal obligations under the Modern Slavery Act, including advising, training and updating our clients in relation to modern slavery risks in their businesses.



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/anti-corruption 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 organization 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.





Code of conduct

The purpose of the Holding Redlich Code of Conduct is to bring all of the policies which specify the behaviors we expect of one another and key policies and expectations we would like to see in our firm.

ASSESSING THE EFFECTIVENESS OF OUR ACTION

Holding Redlich worked with Edge Environment Pty Ltd (Edge) undertake a Modern Slavery Risk Assessment in 2021. Our focus now moves to actions and opportunities to improve Holding Redlich’s organisational response to modern slavery and to develop frameworks that are clear, engaging, practical and effective. We are looking to develop our capabilities with assistance from Edge to set out risk priorities, and to create actions to specifically address those risks.

In future reporting periods, we will:

- conduct 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
- review all current policies and our Supplier Code of Conduct in light of our modern slavery obligations
- evaluate organizational gaps and opportunities in relation to modern slavery obligations
- develop a Responsible Sourcing Framework to manage, mitigate and remedy risk through responsible sourcing
- further deploy online training 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
- engage and inform participants in the procurement and supplier management process through workshops and internal webinars

- review feedback from those people who have responsibility for procurement to ensure they can implement risk mitigation tools and identify high risk areas.

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 45 128 258 564). 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 16 December 2022.

Signed by:



Ian Robertson

National Manager Partner Holding Redlich and Director Justice Services Pty Ltd



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