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# Modern Slavery Statement

1 July 2023 – 30 June 2024

**CORRS  
CHAMBERS  
WESTGARTH**

[corrs.com.au](https://corrs.com.au)

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## Message from the Chair of the Board and CEO

Each year we seek to strengthen our ability to understand and address our risks of modern slavery throughout our supply chain.

During the 2024 financial year we developed a Modern Slavery Policy, along with Guidelines and a Response and Remedy Framework, to provide a stronger foundation for our people to identify, prevent and mitigate adverse human rights impacts and risks of modern slavery. We also strengthened our engagement with our suppliers in relation to the risks of modern slavery in their supply chain, allowing us to work collaboratively with them to address those risks.

While we are pleased with the progress we have made, there is always more work to be done. We remain committed to further strengthening our response to modern slavery risks, in line with the UN Guiding Principles on Business and Human Rights.



Stephen Price

Partner and Chair of the Board  
Corrs Chambers Westgarth



Gavin MacLaren

Senior Partner and CEO  
Corrs Chambers Westgarth  
Director  
Corrs Support Services Pty Ltd

We acknowledge the First Peoples of Australia and their custodianship of Australian lands, including the Wurundjeri People of the Kulin Nation, the Turrbal and Jagera People, Noongar People from the Whadjuk region and the Gadigal People of the Eora Nation and the various lands on which our operations are conducted and on which we work. We recognise their continuing connection to land, waters and culture. We pay our respects to their Elders past and present and recognise that sovereignty has never been ceded.

## Reporting entity

This modern slavery statement (**Statement**) is made on behalf of the Corrs Group in compliance with the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**).

Corrs Group comprises the partnership of Corrs Chambers Westgarth, Corrs Support Services Pty Ltd as trustee for the Corrs Support Services Trust and their respective associated entities, including Corrs Chambers Westgarth Papua New Guinea, Corrs Enterprises Pty Ltd trading as Orbit Legal Resourcing, Telesto Legal and Technology Pty Ltd and Corrs Enterprises Holdings Pty Ltd (**referred to as Corrs, we, us, our** in this Statement). The reporting entities are Corrs Chambers Westgarth and Corrs Support Services Pty Ltd as trustee of the Corrs Support Services Trust.

This is Corrs' fifth modern slavery statement, and has been prepared for the financial year of 1 July 2023 to 30 June 2024 (**Reporting Period**).

## About Corrs

Corrs Chambers Westgarth is Australia's leading independent law firm.

We provide exceptional legal services across the full spectrum of commercial matters, including major transactions, projects and significant disputes, offering strategic advice on our clients' most challenging issues.

With more than 175 years of history and a talented and diverse team of over 1,000 people, we pride ourselves on our client-focused approach and commitment to excellence. Our fundamental ambition is the success of our clients, and this is reflected in everything we do.

We advise on the most significant global matters and connect with the best lawyers internationally to provide our clients with the right team for every engagement.

We are also at the forefront of some of the most high-profile public international law matters in our region, assisting governments and corporations with the resolution of highly complex cross-border disputes.

We are the firm of choice for many of the world's most significant organisations, with our people consistently recognised for providing outstanding client service and delivering exceptional results.

In order to best support our clients, we have offices in Melbourne, Sydney, Brisbane and Perth. We also have an office in Port Moresby, Papua New Guinea.

## Mandatory reporting criteria

We have set out below the page numbers of this statement that address each of the mandatory criteria in section 16 of the Modern Slavery Act.

Mandatory criteria	Page number/s
a. Identify the reporting entity.	Page 4
b. Describe the reporting entity's structure, operations and supply chains.	Pages 6-7
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.	Pages 12-18
d. 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.	Pages 8-11 and pages 16-18
e. Describe how the reporting entity assesses the effectiveness of these actions.	Pages 21-22
f. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Page 23
g. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	All pages

## Our structure and operations

Corrs' operations have remained unchanged since the last reporting period.

Corrs provides legal services to Australian and international clients in the public, private and not-for-profit sectors from four offices in Australia and our office in Port Moresby, Papua New Guinea.

Corrs continues to operate as a partnership in Australia and conducts its operations in Papua New Guinea through a contractual alliance with a local legal practice.

Corrs Support Services Pty Ltd (**CSS**) is the trustee of the Corrs Support Services Trust (**CSST**). The CSST provides various support and administrative services to Corrs Chambers Westgarth that are essential to its operations.

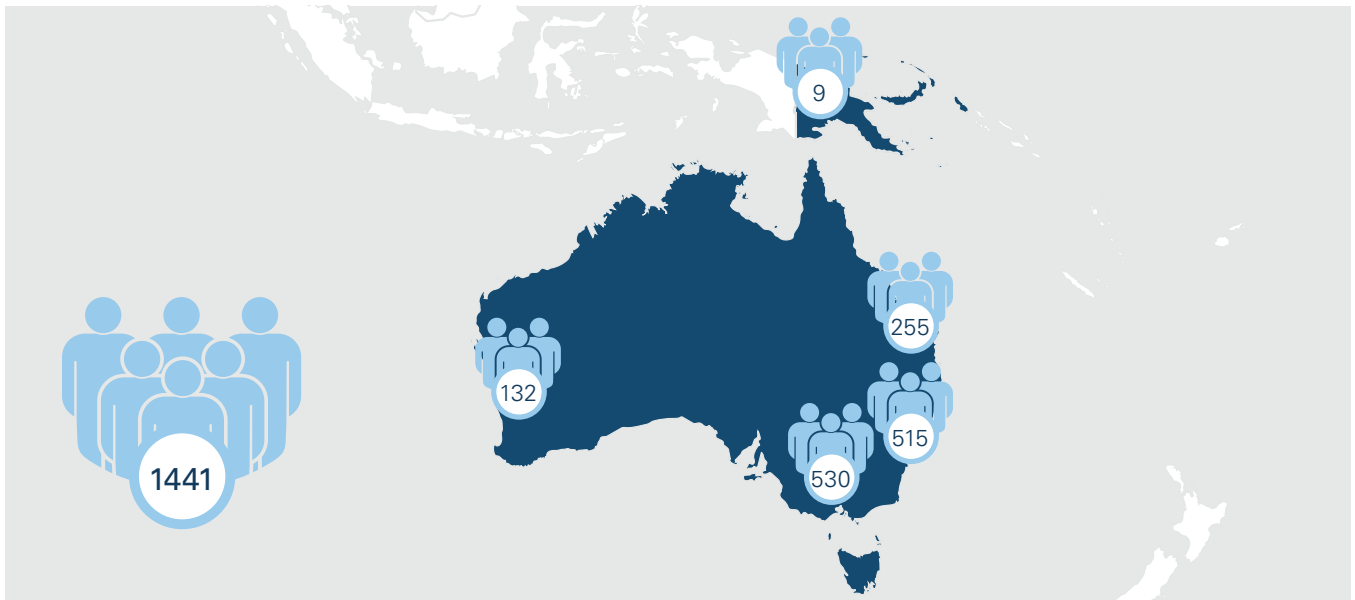
As of 30 June 2024, we had a total headcount of 1,441 including partners, lawyers, professional services staff and support personnel across our operations. 2.3% of our employees are from outside Australia on working visas – this group is comprised of lawyers, professional services staff and support services personnel. Legal staff make up 71.2% of our people and provide legal advice to our clients. Our professional services and support personnel make up 28.8% of our people.

**1,441** Total headcount

**71.2%** Legal staff

**2.3%** Employees who are from outside Australia on working visas

**28.8%** Our professional services and support personnel



Corrs continues to operate its wholly owned subsidiaries namely, Corrs Enterprises Pty Ltd, trading as Orbit Legal Resourcing Pty Ltd (**Orbit**), Telesto Legal and Technology Pty Ltd (**Telesto**) and Corrs Enterprises Holdings Pty Ltd. Our operations are outlined in detail on the following page.

## Our operations in detail

Our lawyers provide legal services across the following sectors and practice areas:

- Arbitration
- Banking and Finance
- Board Advisory
- Class Actions
- Competition
- Corporate Commercial
- Employment and Labour
- Energy and Natural Resources
- Environment and Planning
- Financial Sponsors
- Government
- Intellectual Property
- Investigations and Inquiries
- Litigation
- Mergers, Acquisitions and Capital Markets
- Projects and Construction
- Real Estate
- Responsible Business and ESG
- Restructuring, Insolvency and Special Situations
- Tax
- Technology, Media and Telecommunications

There are a number of business services teams that support our lawyers and clients:

- **Administration** provides a range of front of house and support services to Corrs in partnership with key suppliers. This includes managing building services for our Australian and Papua New Guinea offices.
- **Business Development** work alongside our legal staff and business services to deliver activities that promote our legal services and build our relationships with clients.
- **Communications** is responsible for our media relations, internal communications, publication and distribution of external-facing content, and events.
- **Finance** is responsible for managing the firm's financial resources, financial planning, reporting and analysis.
- **Legal Project Management** assists our legal staff throughout the lifecycle of legal matters, from pitches and tenders, to planning, scoping and evaluating matters.
- **Legal Support** comprises our firm-wide network of legal assistants, document production specialists and office assistants, who support our legal staff.
- **Legal Technology Solutions (LTS)** works with our legal staff and provides clients with comprehensive legal technology solutions, including litigation support, document production, freedom of information and inquiry responses, and contract management.

- **People and Performance** is responsible for recruitment, retention, remuneration, workplace health and safety, and performance and career development for our people.
- **Productivity and Realisation** assist with pricing and billing, as well as monitoring and managing the utilisation and productivity of our people.
- **Technology** is responsible for information technology support and training, data security and cyber risk, and developing and maintaining the systems and technologies that support our delivery of legal services.

Our professional services personnel work under various employment arrangements, including full-time, part-time and casual arrangements. On occasion, we may engage temporary agency staff to meet specific business requirements, such as staffing events and functions.

## Our subsidiaries

Corrs Enterprises Pty Ltd trading as Orbit is a wholly owned subsidiary of the Corrs Group. Orbit manages a network of qualified lawyers from across Australia to provide temporary in-house legal resourcing solutions for Corrs' clients, particularly when needed for an urgent project or to fill a temporary gap in their in-house team. Depending on the clients' needs, Orbit lawyers may be contracted on a full-time or part-time basis and for a period of one week to over 12 months. During the Reporting Period, Orbit had 147 lawyers in its candidate pool.

Orbit works in consultation with the business directly to find the right solution for our clients. Orbit's operations primarily entail managing the resourcing and onboarding of lawyers, as well as the administration associated with their assignment.

Telesto is another Corrs Group wholly owned subsidiary incorporated in August 2016, which provides e-discovery services. Telesto's services supplement Corrs' own legal technology services offering, using commercially available cloud computing and cloud storage. Telesto provides the expertise and innovation developed by Corrs' LTS team to clients that no longer require or are otherwise unable to engage Corrs' legal services. The services provided by Telesto include data processing, hosting and review, consulting services, paralegal services, bespoke e-Discovery tools, and document production.

Corrs Enterprises Holdings Pty Ltd was incorporated in July 2016 to conduct commercialisation activities on behalf of the Corrs Group arising from our innovation activities that do not relate to the provision of legal services. These innovation activities include Corrs Collaborate, which is a tool that integrates into our clients' existing legal practice and business. Corrs Collaborate offers an encrypted central repository for data, a two-way communication, collaboration and workflow tool, and reporting functionality.

## Modern slavery governance and management

Our efforts to assess and address modern slavery risk in our operations and supply chain are guided by our policies and implemented in accordance with the procedures that form part of our governance framework.

During the Reporting Period, we reviewed our policies and procedures related to modern slavery and implemented some new policies to ensure they reflect best practice, improve integration, enhance risk management and better align with the firm’s operational structure.

This included:

- developing and implementing a Modern Slavery Policy, including Modern Slavery Policy Guidelines and a Modern Slavery Response and Remedy Framework;
- expanding our Sustainability Working Group (SWG);
- strengthening internal capacity building; and
- reviewing associated policies and processes to enhance our contracting and supplier onboarding process.

Our policies are listed in the following table:

Policy	Purpose and ownership
Modern slavery and procurement policies	
Modern Slavery Policy	Describes Corrs’ commitment, and provides a framework for identifying, assessing and addressing Modern Slavery risks within our supply chain and operations. <b>Owned by:</b> Head of Responsible Business and ESG.
Modern Slavery Policy Guidelines	Supports Corrs personnel to effectively implement the Modern Slavery Policy. <b>Owned by:</b> Head of Responsible Business and ESG.
Modern Slavery Response and Remedy Framework	Provides guidance for Corrs personnel when considering or responding to any grievances, concerns or reports received regarding actual or potential incidents of Modern Slavery in our operations or supply chain. <b>Owned by:</b> Head of Responsible Business and ESG.
Contracts Policy	Sets out Corrs’ requirements in entering into any document that creates legal rights or imposes legal obligations or liabilities on behalf of any entity within the Corrs Group. <b>Owned by:</b> General Counsel.
Ethical Sourcing Policy	Outlines our practices for ensuring we meet our ethical business standards when engaging in procurement, including taking into account a supplier’s commitments and actions in respect of human rights, diversity and inclusion, First Nations reconciliation, and community and environmental impacts of their operations and data security. <b>Owned by:</b> General Counsel.
Supplier Minimum Standards	Sets out the Minimum Standards we expect of our suppliers in relation to ethical business practices, labour rights, anti-discrimination, safety and environmental management. <b>Owned by:</b> General Counsel.



Policy	Purpose and ownership
Other relevant policies	
Health and Safety Policy	Sets out our commitment to providing, so far as is reasonably practicable, a work environment that is safe and without risks to the health, safety and wellbeing of Corrs personnel, clients and visitors who work, do business in, or visit our workplaces. <b>Owned by:</b> Chief Operating Officer and Chief People Officer.
Respect in our Workplace Policy	Sets out responsibilities to prevent discrimination, harassment, bullying and other inappropriate conduct, outlines relevant behaviours, and explains how to raise concerns and access support. The Modern Slavery Policy indicates that concerns regarding modern slavery can be reported in accordance with this policy. <b>Owned by:</b> Chief Operating Officer and Chief People Officer.
Whistleblower Protection Policy	Sets out how to raise concerns about suspected serious misconduct without fear of reprisals or victimisation. The Modern Slavery Policy indicates that concerns regarding modern slavery can be reported in accordance with this policy. <b>Owned by:</b> Ethics and Conflicts Partner.

## Implementing our Modern Slavery Policy

In this Reporting Period, we finalised and adopted a board approved Modern Slavery Policy, including Modern Slavery Policy Guidelines and a Modern Slavery Response and Remedy Framework.

The Modern Slavery Policy expresses Corrs' commitment to, and provides a framework for, identifying, assessing, and addressing modern slavery risks in our operations and supply chain in line with the UNGPs.

The Modern Slavery Policy allocates responsibility for overseeing the implementation of Corrs' Modern Slavery commitment between various Corrs Group bodies.

The Modern Slavery Policy provides for individuals (including workers in our supply chain) to report concerns related to modern slavery, including directly to our Head of Responsible Business and ESG. It consolidates Corrs existing avenues for employees to raise any concern regarding any conduct, conditions or practices that could amount to modern slavery. It expressly provides for concerns to be raised through our Whistleblower Policy and our Respect in our Workplace Policy.

### Responsibility for overseeing the implementation of Corrs' Modern Slavery commitment

- Corrs' cross functional Sustainability Working Group (**SWG**) (formerly known as the Responsible Business Working Group (**RBWG**)) is chaired by the Head of Responsible Business and ESG and oversees the implementation of Corrs' actions to identify, assess and address modern slavery risks. The SWG meets regularly to review progress, coordinate actions, and resolve issues, informing the firm's modern slavery risk assessment and provides oversight of supply chain risks.
- The chair of the SWG reports to the Audit and Risk Management Committee (**ARMCO**). The chair of ARMCO reports any material issues to the Board of the Partnership or CSS (as appropriate) and/or the Chief Executive Officer.
- The General Counsel team maintains, reviews and updates the firm's procurement policies, playing a key role in identifying and assessing modern slavery risks in supplier contracting and onboarding.
- Boards of the Partnership and CSS are responsible for approving our annual Modern Slavery Statement in compliance with our obligations under the Modern Slavery Act. ARMCO and the Board of the Partnership oversee, review and approve the firm's Risk Management Framework, which includes actions and governance to identify, assess and address modern slavery risks in our operations and supply chain and implement Corrs' Modern Slavery commitment.

## Sustainability Working Group

During the Reporting Period, our SWG, which is responsible for coordinating the firm's sustainability initiatives, was expanded.

Recognising the growing need for a holistic and cross-functional approach to sustainability, the SWG continues to be chaired by the Head of Responsible Business and ESG and includes representatives of the Corrs partnership and from our business services teams, including our people and performance and risk and compliance functions. The recently expanded membership now includes representatives from our pro bono, diversity and inclusion and gender equality teams.

The SWG is also assisted by the legal professionals in our Responsible Business and ESG practice group who have expertise in business and human rights. A member of the SWG is a member of ARMCO.

## Modern Slavery Response and Remedy Framework

Establishing a remediation framework is an important aspect of realising our commitment to respect human rights. During the Reporting Period, the Board approved and we adopted our Modern Slavery Response and Remedy Framework which outlines the approach we will take when we identify or are made aware of allegations or incidents of modern slavery in our operations or supply chain.

Our Modern Slavery Response and Remedy Framework is founded on principles of transparency of access, safeguarding of victims, confidentiality and taking preventative action. It aligns with the UNGPs, including a commitment to remediating, or cooperating in the remediation of, any harm that we determine we have caused or contributed to.

The Modern Slavery Response and Remediation Framework provides for concerns raised under the Modern Slavery Policy to be referred to the Head of Responsible Business and ESG or the CEO (or delegate). Depending on the nature of the concerns raised, appropriate Corrs personnel may be engaged to address those concerns and, if required, a Modern Slavery Response Team may be established. This would include our modern slavery experts to be joined by members of the General Counsel, Risk and Legal Excellence, People and Performance or Communications teams and other specialist Corrs personnel (such as legal subject matter experts).

Our Supplier Minimum Standards require our suppliers to uphold the same commitment to transparency, accountability and human rights as we do, and to collaborate with us to foster safe and ethical working environment across our supply chain. In the next reporting period, we will be communicating with suppliers in respect of their responsibilities to cooperate fully with our remediation efforts should instances of modern slavery arise in their operations or supply chains, including providing timely information, taking corrective actions when necessary and supporting affected workers.

## Internal capacity building

Completing our Human Rights and Modern Slavery online learning module continues to be a mandatory requirement for all new legal staff. We regularly update our training module to reflect the changing profile of risk, the regulatory environment and best practice. As at the end of the Reporting Period, 537 legal staff had completed the training module representing 66% of our current legal staff having completed the training module. During the Reporting Period, we rolled out the training module to our CCW and CSST Boards. Completion rates of board training will be reported on in the next reporting period.

We developed comprehensive Modern Slavery Policy Guidelines to support our personnel engaging in procurement activities effectively implement the new Modern Slavery Policy. The Guidelines equip our people with the necessary tools and knowledge to ensure that our procurement processes are lived in our day-to-day practice, enabling us to action our commitments. In the next Reporting Period, we will be conducting training in respect of the Modern Slavery Policy Guidelines for our people who regularly procure good and services.

As concerns of modern slavery can be raised under several policies including our Whistleblower Policy and Respect in our Workplace Policy, training will be provided to our Whistleblower Contact Officers and our Workplace Contact Officers.

We will be incorporating capacity building and education around victim-centred responses to modern slavery reporting and the application of our Modern Slavery Remediation Framework in our Whistleblower Contact Officers and our Workplace Contact Officers training program going forwards.

With the adoption of our Modern Slavery Response and Remedy Framework, in the next reporting period we will also be conducting training for our people who may be involved in receiving or have a role in addressing reports of modern slavery, particularly those who may be called upon as a member of a Modern Slavery Response Team.

## Enhancing contracting and supplier onboarding processes

Contracting with new suppliers and our supplier onboarding processes provides us with an opportunity to ensure our business partners are aware of our commitment to mitigating and preventing modern slavery and our expectations of them in assisting us to implement this commitment.

During the Reporting Period, we refined our standard modern slavery contract clause to reflect industry best practice, global regulatory developments concerning mandatory human rights due diligence and the updated unfair contract terms (UCT) regime. As we developed our Modern Slavery Policy, we also sought to improve associated policies and practices based on our experience engaging with suppliers when implementing them.

In particular, we considered the ongoing challenge of engaging with suppliers who are unable or unwilling to respond to our requests for information or commit to our Supplier Minimum Standards, citing the administrative burden it would impose or internal directives not to agree to third party policies. This is sometimes the case even when suppliers have their own sophisticated risk minimisation systems.

To address these challenges, and support our people in their engagement with suppliers, we reviewed and prepared amendments to our Contracts Policy to:

- clarify the implementation of the Contracts Policy, including that suppliers have or commit to implementing their own policies, procedures and systems to ensure they can meet Corrs' Supplier Minimum Standards (rather than being asked to implement our policies or processes);
- amend the forms that are used when seeking approval of new supplier contracts or contract renewals to better support our people to obtain supplier commitment to meeting our Supplier Minimum Standards;
- clarify the circumstances in which supplier contracts are to include express modern slavery clauses; and
- provide that modern slavery risks that arise in contract negotiations are to be referred to Corrs' General Counsel team.

These amendments were approved and commenced implementation in the FY25 reporting period, and we will monitor whether these are effective in addressing the reluctance of some of our suppliers and achieving increased engagement.

In the FY25 reporting period, we will amend the Whistleblower Policy to reinforce that reports relating to modern slavery can be raised under this policy.

## How we assess risks of modern slavery

As disclosed in previous statements, we apply a human rights risk-based approach to identifying and assessing risks of modern slavery, focusing our efforts on high-risk areas within our operations and supply chain. Our assessment is informed by external datapoints such as the Global Slavery Index (GSI) and inherent modern slavery risks associated with jurisdiction, industry sectors, products and services and workforce.

In respect of our supply chain, we continue to utilise a cloud-based supply chain management platform to facilitate and support our tracking and management of supplier data, the evaluation of modern slavery risks and our ongoing supplier engagement. Through this platform we issue self-assessment questionnaires (SAQs) to suppliers identified as medium or higher risk, asking these suppliers to provide details relating to the actions they are taking to evaluate, assess and address human rights risks, including modern slavery risks, throughout their operations and supply chains. Through these assessments, we seek to gain greater insight into commodity and labour-related risks, as well as the steps suppliers are taking to mitigate modern slavery risks in their operations and supply chains.

Further, the platform enables us to assess risks not only at the first tier but also to extend our oversight into the second tier of our supply chain, strengthening our overall approach to mitigating risks of modern slavery.

In addition to collecting, reviewing and monitoring supplier data, we integrate insights obtained through direct engagement with our suppliers, and through industry engagement and research, to ensure a comprehensive understanding of our potential exposure to modern slavery risks.

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## Modern slavery risk in our operations

Based on the following factors and actions we have taken, we continue to assess the risk of modern slavery in our operations as low.

- The legal services industry is a highly regulated sector with low inherent risks of modern slavery.
- Our direct workforce consists primarily of specialist roles, including lawyers and our business services staff, which present low risks of modern slavery in Australia.
- We do not employ casual or temporary staff in low skilled roles.
- Employees are provided with written contracts of employment.
- We have compliance measures in place to ensure our direct workforce are paid above minimum wage, including those covered by the Legal Services Award.
- We have systems in place to identify when our people are working excessive hours, including alerts that are sent to partners and our People and Performance team to enable them to reallocate work.
- Our Respect in our Workplace Policy expresses our commitment to creating an environment that is fair, supportive and safe for everyone and sets out the responsibilities of each person to recognise, discourage and prevent discrimination, harassment, bullying or victimisation (or other relevant unlawful conduct or inappropriate behaviour) in the workplace. This policy explains how to raise a concern about behaviour experienced or observed in the workplace, and the people and services available to support those affected. This is supplemented with mandatory training and an Employee Assistance Program that staff and their family can use to access confidential counselling with registered psychologists.
- We have policies and leave arrangements in place to support staff who may be in abusive relationships, for example those experiencing family violence.
- 99.4% of our workforce is located in Australia, which is a low-risk jurisdiction for modern slavery according to the GSI, and we do not perform work in any high-risk sectors.

## Our supply chain

As a professional services firm operating from offices around Australia and in Papua New Guinea, our greatest expenditure is in remuneration. Thereafter, our supply chain expenditure predominantly consists of goods and services for the maintenance and servicing of our offices, facilities and support services enabling us to effectively serve our clients.

During the Reporting Period, the nature of our supply chain did not change substantially from the previous reporting period. The key categories of spend in our supply chain remain unchanged and are described below:



Information and communication technology (ICT) and services (including hardware such as computers and phones, and software)



Education and knowledge services



Hospitality (such as catering and events services)



Office furniture and supplies / consumables



Merchandise and marketing



Professional services (including financial services such as insurance and accounting)



Human resources and employment services



Business operations (including leasing and facilities management)



Transport and logistics



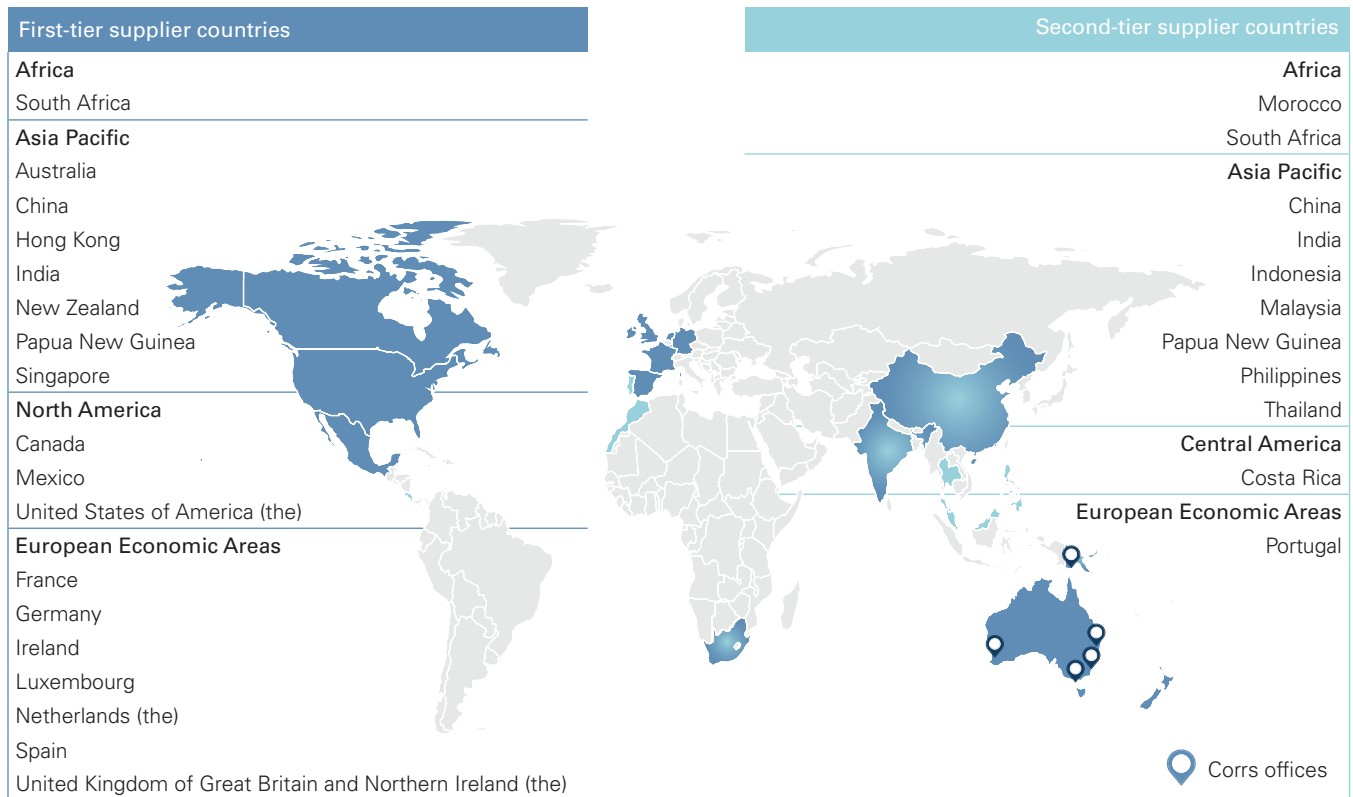
Business travel and accommodation

During the Reporting Period, we procured from approximately 650 first-tier suppliers (our **First-Tier suppliers**). This figure excludes purchases made on firm issued credit card transactions. A significant proportion of our credit card spend is related to business travel and accommodation, and to a lesser extent purchase of meals.

Approximately 84% of our First-Tier suppliers are based in Australia. We also have suppliers based in Africa and Asia-Pacific, countries in the European Economic Areas, North America and the United Kingdom of Great Britain and Northern Ireland.

Through our supply chain mapping we have identified that some of our First-Tier suppliers in Australia source goods or services from their own suppliers (**Second-Tier suppliers**) located in other jurisdictions.

Refer to map depicting our supply chain on the following page.



### Papua New Guinea

Our Papua New Guinea office predominantly procures goods and services from the suppliers that service our Australian operations. For example, we procure laptops, audiovisual equipment, corporate travel management services and printing services from our Australian-based suppliers for our Papua New Guinea office. However, our Papua New Guinea office engaged 30 local suppliers who provide facilities management services including cleaning, hospitality services, corporate transport, and technology services including mobile phones and data services as well as professional, financial and education services.

### Telesto and Orbit

Telesto and Orbit continue to use the same suppliers as Corrs Chambers Westgarth for the majority of products and services they procure, including for ICT hardware and software. However, Telesto uses a different multi-factor authentication provider to Corrs Chambers Westgarth, and Orbit engages directly with a human resources service provider who undertakes background checks on behalf of employers when screening prospective Orbit lawyers.

# Modern slavery risk in our supply chain

## Key areas of modern slavery risk in our supply chain

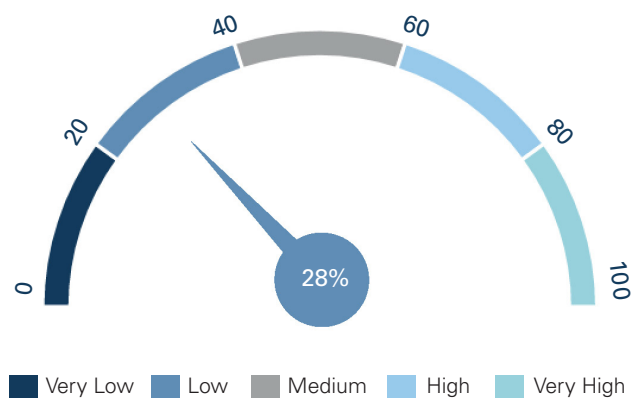
Our key areas of modern slavery risk for this Reporting Period remain consistent with our previous modern slavery statements, and include:

- facilities (including cleaning, car parking, security and other services);
- ICT, including knowledge service providers;
- suppliers operating in Papua New Guinea;
- suppliers using labour outsourcing; and
- travel services (including transport and accommodation).

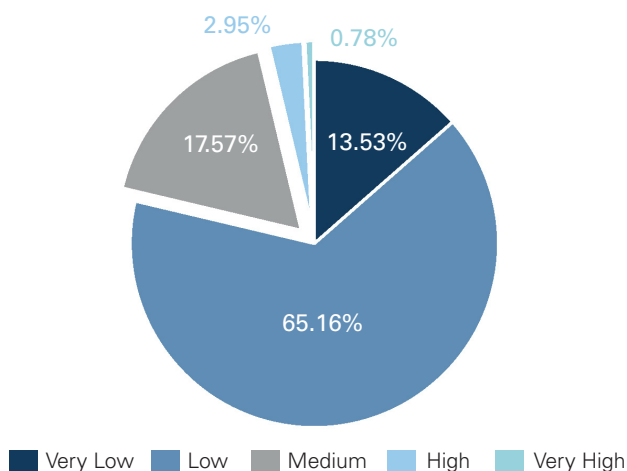
As stated in the section titled **Our supply chain** on page 13, during the Reporting Period, we procured goods and services from around 650 First-Tier Suppliers.

While our average supplier risk is low, 21% of suppliers are rated medium risk or above.

Average supplier risk



Supplier risk



All suppliers with a risk rating of medium risk or above are sent an SAQ. Some FY24 suppliers have been a part of our supply chain for many years and depending on when they were first rated medium-risk or above they were sent an SAQ between late September 2021 and 30 June 2024.

Of the FY24 suppliers who were asked to complete the SAQ, 23% of suppliers completed it and a further 4.5% of suppliers have been otherwise engaged in the process. The remaining suppliers have not responded despite multiple reminders.

The below analysis of these responses to our SAQ reinforces the importance of working with our suppliers to build their awareness and understanding of modern slavery risks and their preparedness and capacity to engage in modern slavery risk assessment and minimisation.

**15%** Suppliers that are reporting entities (in Australia or another jurisdiction)

**40%** General understanding of modern slavery risk but had not undertaken a formal assessment

**17%** Undertaken an internal assessment of their supply chain and operation

**5%** Planning to assess in next 12 months

While we can draw some insights into the level and nature of risks in our supply chain, and in particular the nature of risks and actions taken to address those risks, by suppliers that have responded, the lower than desired level of responses to the SAQ limits the extent of our visibility. We will keep developing and implementing strategies to increase this engagement and will investigate opportunities for enhanced technology solutions and possible use of artificial intelligence (AI) to enhance our data and supplier assessment process.

As part of our commitment to assessing high-risk suppliers, increasing levels of engagement and identifying potential impacts, we prioritise suppliers based on key areas of risk for additional assessment and engagement beyond the SAQ process. Specifically, in this Reporting Period we identified ICT, knowledge services and suppliers based in Papua New Guinea as key areas for further engagement and risk minimisation measures. The basis for focussing on these key areas of risk and the actions we have taken are discussed in more detail below.

## Addressing modern slavery risk in our supply chain

We have taken a number of actions to address the risks in our supply chain in the context of improving our governance framework and management processes, see section titled **Modern slavery governance and management** on page 8.

In respect of modern slavery training for suppliers to enhance understanding and knowledge of modern slavery risks, see section titled **Supplier training** on page 21.

In this Reporting Period, we focused on building a more detailed understanding of and developing our risk minimisation measures to address modern slavery risks arising in three of our key risk areas:

- ICT;
- knowledge service providers; and
- suppliers operating in Papua New Guinea.

### Information and communications technology

We have continued to focus on modern slavery risk in the ICT industry this Reporting Period. Despite our persistent approaches to suppliers and our ongoing interrogation of their policies and practices, we have faced numerous challenges including:

- difficulty in building leverage and engaging with suppliers meaningfully, even when the identification of risks of modern slavery related to the products we procure are relatively straight forward; and
- many suppliers of ICT products and services outsource aspects of their operations, such as support centres, manufacturing facilities and data centres. This limits our visibility and increases risk of modern slavery in lower tiers of our supply chain; and
- barriers in collaborating with some multistakeholder organisations to better understand their work to protect worker's rights in electronic supply chains as these groups are often not open to business/professional services membership and do not yet facilitate participation from corporate consumers of electronic goods.

Based on this experience, we refocused our efforts on strengthening internal processes and implemented several initiatives aimed at integrating modern slavery due diligence process into our existing operational frameworks. This approach is designed to enhance our leverage and increase our ability to influence our ICT suppliers.

We did this by:

- enhancing our third-party risk assessment processes; and
- commencing a review of our ICT supply chain contracts and agreements to ensure the inclusion of modern slavery risk assessments.

### Enhancing our third-party risk assessment processes

Corrs' third-party risk assessment process evaluates potential suppliers against ten key security metrics under our cybersecurity and risk framework, determining a risk profile, ranging from low to critical. We have updated this process to include modern slavery risk as a key metric.

Suppliers not subject to a security review referred to above are managed by a gatekeeper and are issued an SAQ before a Purchase Order is raised.

We also embedded due diligence processes in new or amended Statements of Work (SoW) with existing suppliers to ensure that they meet our Supplier Minimum Standards, using contract renewals for further engagement when necessary. This work is ongoing.

#### Example: Third-party risk assessment process in action

We recently engaged a consulting service that provided technical support with the implementation of changes related to our website. During the onboarding process and at the time of issuing a Purchase Order we noted that the provider was a new supplier that had not been assessed by our cloud-based modern slavery management platform, nor issued with an SAQ. Before issuing a Purchase Order we sent the provider an SAQ to complete. Similarly, when renewing a contract with an existing supplier and upon initiation of the Purchase Order we noted that while the provider had been issued with an SAQ during the Reporting Period, the provider had not completed it. We used this opportunity to engage with the supplier to encourage completion of the SAQ. This engagement is ongoing.



## Review of our ICT supply chain

We commenced a review of our ICT supply chain by evaluating our existing contracts and agreements to ensure they incorporate a modern slavery risk assessment.

Many of our higher risk suppliers are PNG-based telecommunications providers where there are few alternative suppliers available to Corrs and engagement is challenging. We discuss this further in the section titled **Suppliers operating in Papua New Guinea** on page 18.

In the next reporting period, we will expand this review to all our ICT suppliers, including in Papua New Guinea. Once we identify high-risk suppliers, we will develop a strategic engagement plan.

## Industry engagement

We continued to support the work of Save the Children Australia (STC) on their Child Labour Remediation Hub. This is an initiative that provides an opportunity for participating Australian businesses (including Corrs) to support a program aimed at remediating child labour in the artisanal cobalt mining sector in the Democratic Republic of Congo (DRC) in response to the known and significant risks of child labour in the cobalt supply chain – an essential product in the manufacture of batteries and other ICT equipment. The launch event was a collaboration between STC and The Centre of Child Rights and Business and discussed the challenges of child labour in cobalt mining and remediation solutions for business and risk.

## Knowledge service providers

During the last reporting period, we identified our knowledge service providers as posing a moderate risk of modern slavery. This assessment was based on several factors, including the limited visibility into their operations and supply chains and general reluctance of this supplier group to engage in our due diligence process or to agree to our Supplier Minimum Standards.

In our engagement with a target group of these suppliers over this and the previous reporting period, we have come to understand that large, often multinational suppliers are either unwilling or prevented by internal policy positions from committing to adhere to a third party's code of conduct due to the perceived significant administrative burden it would impose on their organisation. This feedback has been echoed by other ICT suppliers.

Consequently, we prioritised deepening our understanding and engagement with these suppliers and it became evident that there was a misunderstanding of what we expected of them. As a result, we are working to clarify our process to make clear that where suppliers confirm they have their own policies and processes in place that are equivalent to, or meet our Supplier Minimum Standards, they are not required to adopt our policies and processes. For information about how this is being incorporated into our policies and processes see the section titled **Enhancing contracting and supplier onboarding processes** on page 11.

One supplier refused to complete our SAQ indicating that it has determined not to complete surveys of this nature on the basis that it is a private company under no obligation to share such details. This supplier did state that it complies with all applicable laws and referred us to its Modern Slavery Statement. However, its Modern Slavery Statement did not provide sufficient insight into its operations and supply chain and this is the subject of ongoing engagement.

In the next Reporting Period, we will aim to escalate our engagement with suppliers to more senior levels of management, such as sustainability or risk officers to obtain further information for the purposes of our due diligence.

This lack of engagement is particularly concerning given the potential risks of modern slavery in knowledge service providers. A new and emerging risk relates to those knowledge providers using or involved in the development of AI technologies. Research indicates that companies are frequently outsourcing to jurisdictions with high risks of modern slavery for both upstream activities (outsourcing data collection and annotation, model training) and downstream activities (outsourcing AI deployment, maintenance and support). These risks will require further interrogation in the next reporting period.

## Suppliers operating in Papua New Guinea

During this Reporting Period we initiated a review of our suppliers in PNG. As part of this review, we followed up with suppliers that had not responded to our SAQ, conducting meetings with key suppliers to discuss the reasons for requiring compliance and offered support to navigate the requirements.

We have learned from our suppliers about the complexities of operating in high-risk jurisdictions such as PNG, and the need for ongoing dialogue, engagement and shared action.

To this effect, in the next reporting period we will:

- refine our approach, with a focus on building stronger, more collaborative relationships with our PNG suppliers to enhance transparency and supply chain integrity;
- roll out a PNG specific version of our SAQ to suppliers in PNG. We recognise the need to introduce a tailored SAQ template to make it easier for these suppliers to provide the information necessary to enable us to adequately assess the risks of modern slavery in our supply chain in PNG; and
- conduct a tailored PNG specific supplier webinar, led by a specialist partner and PNG legal staff.

In addition, we are exploring the possibility of partnering with local organisations in Australia who may be able to facilitate the collection of required information more effectively than we can manage remotely.

## Supplier training

To improve the level and quality of our supplier engagement, and assist smaller suppliers with capacity building, we made a training session available to our suppliers in May 2024. This webinar was run by two legal professionals from our Responsible Business and ESG practice group and focused on answering common queries we receive from our suppliers relating to modern slavery.

The training addressed the following key issues.

- What are the recent recommended changes to the Modern Slavery Act? What do I need to know?
- My business is not required to submit a modern slavery statement, so why is this relevant to my business?
- What are the emerging risks of modern slavery in Australian supply chains and how do I identify those risks – what indicators should I be looking for?
- How do I meet the requirements of Corrs' Supplier Minimum Standards and the varying requirements across all of my customers?

## Collaboration and building understanding

Fundamental to our strategy for identifying and addressing risks of modern slavery is continually improving and building upon our internal and community engagement with modern slavery prevention and mitigation, and businesses' responsibility to respect human rights more broadly.

During the Reporting Period, Corrs continued to develop its external engagement with industry and civil society and strengthened its internal education on modern slavery.

### Collaboration

Corrs endeavours to actively contribute to the modern slavery community and improve our stakeholder engagement. During the Reporting Period we undertook the following actions.

- Continued our membership of the United Nations Global Compact Network Australia (UNGCNA) Modern Slavery Community of Practice (MSCoP). The MSCoP is a community of industry leaders in respect of supply chain and modern slavery risk management. Aligned with the purpose of the MSCoP, we support our internal SWG as well as other members in responding to increased regulatory movements on modern slavery and human rights due diligence. Topics of focus in the Reporting Period, included the regulatory movement relating to modern slavery as well as the principle of continuous improvement in Australia's modern slavery disclosure regime and progress made by Australian businesses.
- Hosted UNGCNA Australian Dialogue on Business and Human Rights in August 2023. The Dialogue convened a broad set of stakeholders across business, government, civil society and the investor community to discuss key business and human rights issues within Australia and explore how Australian businesses can meet and exceed stakeholder expectations.
- On behalf of the United Nations Working Group on Business and Human Rights, Corrs hosted consultations with the financial sector on the topic of Investors, ESG and Human Rights in Melbourne and Sydney. The consultations were led by Professor Robert McCorquodale with the purpose of seeking the views of financial sector participants on the integration of human rights standards and processes with ESG criteria and investment practices. The views expressed in the consultation informed the UN Working Group's report on how to better align ESG approaches with the UNGPs. The Report was presented to the 56th session of the Human Rights Council in June 2024.

- Continued our commitment to actively participate in the Business and Human Rights Lawyers Association (BHRLA) by collaborating with the BHRLA in March 2024 to facilitate capacity building, thought leadership and industry collaboration for law firms advising on business and human rights issues.
- See the section titled **Industry engagement** on page 17 for more information regarding our support for STC in respect of challenges surrounding child labour in cobalt mining and remediation solutions for business and risk.
- Hosted a panel discussion with a Hagar representative from Thailand. Hagar works to strengthen justice systems, support survivors and hold offenders accountable for crimes of human trafficking and sexual exploitation. The discussion focused on the multi-disciplinary, victim-centred approach taken to restore life and dignity to survivors.

### Building understanding

Corrs is committed to contributing to the ongoing modern slavery dialogue in Australia and the education of our clients and the Australian business community as a means of increasing the likelihood of modern slavery risks being identified and mitigated.

During the Reporting Period, we delivered, participated in, or facilitated a range of information or educational initiatives in respect of human rights impacts of business operations, including risks of modern slavery. Some of these were delivered in partnership with clients, pro bono partners and other industry stakeholders.

Throughout the Reporting Period, we continued to publish thought leadership insights in the form of articles, publications and podcasts. Our insights address a variety of responsible business and ESG issues, including new and emerging modern slavery risks and regulation.

Some of the insights we published during the Reporting Period are listed on the next page.

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## Essential ESG podcast



[Emerging drivers of change in business and human rights](#)



[Responsible business in conflict-affected and high-risk areas](#)



[The intersection between human rights, climate change and decarbonisation](#)



[The relevance of statutory charters of rights for business](#)



[Macro trends in sustainable finance](#)

View more at: <https://www.corrs.com.au/essential-esg>

## Insight articles



[The changing tide: understanding human rights for business](#)



[An unsustainable approach? Overcoming competition law obstacles to sustainability collaboration](#)



[What's rights got to do with it? The increasing relevance of statutory charters of rights for business](#)



[Recent ESG developments in Australia: an update](#)



[ESG and the successful delivery of major projects: key considerations for project proponents](#)



[Dynamic due diligence: managing new and emerging acquisition risks](#)

View more at: <https://www.corrs.com.au/insights>



## Effectiveness of our program of work

Corrs is committed to a program of continuous improvement to ensure that our efforts to identify, assess and address modern slavery are effective.

During the Reporting Period, we reviewed the effectiveness of the following aspects of our program:

- internal capacity building;
- supplier questionnaires;
- supplier education;
- onboarding and contracting;
- processes and implementation; and
- awareness raising.

Over the next reporting period, we will develop an effectiveness framework that will provide guidance to how we consider and measure the effectiveness of our actions over time and to consolidate our effectiveness measures.

### Internal capacity building

During the Reporting Period, we did not receive any reports or complaints of potential modern slavery through our internal reporting processes. However, we have received more inquiries and questions from staff undertaking procurement and client facing activities than in previous years, which positively indicates an increased awareness and concern for issues relating to modern slavery.

We are continuing to engage staff with mandatory onboarding training and updated modules to ensure familiarity with our existing and new policies and procedures including the Modern Slavery Response and Remedy Framework. We expect this to contribute to ongoing engagement with and concern for modern slavery related issues in the course of day-to-day operations. To understand our impact in the next reporting period, we will re-issue our knowledge, attitude and practices survey to measure how internal capacity building and knowledge has improved since 2021 when it was last applied.

We will monitor the implementation of the Modern Slavery Policy, Modern Slavery Guidelines and Response and Remedy Framework and assess the effectiveness of our training for our business services and procurement personnel to identify and address modern slavery risk issues in the procurement process.

### Supplier questionnaires

As mentioned on page 15, obtaining supplier responses to our SAQs and requests for information about their modern slavery risks and management systems continues to be challenging. Our systems and processes in relation to SAQs and follow-up calls are strong. However, response levels continue to be low and despite rigorous standards this limits the effectiveness of the SAQ process informing our risk assessments.

Alternative avenues to obtain the required information will be pursued in the next reporting period, including a review of technology solutions that may enable us to gain more information about our suppliers and better assess their actual risks of modern slavery.

### Supplier training

As detailed in the section titled **Modern slavery risk in our supply chain** on page 15, to improve the level and quality of our supplier engagement and to assist smaller suppliers with capacity building we again delivered a webinar on modern slavery and our expectations of our suppliers. This is the second consecutive year we conducted this training. While we saw an increase in attendance during this Reporting Period and some suppliers have indicated and provided feedback that the training was useful, this has not increased the level of responses to our requests for information or completion of our SAQ nor lowered our risk profile.

In the next reporting period, we will continue to deliver our annual webinar to suppliers and monitor participation rates and will make a recorded webinar available to those who cannot attend at the time of delivery. We will be delivering a tailored training for our PNG suppliers led by our PNG lawyers to address the low levels of engagement with our suppliers in PNG.

We will also provide updates to our suppliers in respect of any changes to the legislative framework or information provided by the Attorney General's Department.

## Onboarding and contracting

One way we tackle modern slavery risk is to require suppliers to commit to being able to meet our Supplier Minimum Standards. However, obtaining this commitment has been challenging. Through significant inquiry we determined this difficulty is often associated with a disinclination of suppliers to be bound by a third party's code of conduct given the administrative burden it would impose on the organisation. This issue is detailed in the section titled **Modern Slavery risks in our supply chain** on page 15.

To address this, we commenced refining our contracts and supplier onboarding process to clarify that suppliers need only confirm they have policies, procedures and systems in place to ensure they can meet the standards expressed in our Supplier Minimum Standards, not that they comply with our policies and procedures. Additionally, we drafted amendments to provide that where suppliers decline or refuse to meet our Supplier Minimum Standards and instead provide their own policies, our business services and procurement personnel can consult with our General Counsel and our Responsible Business and ESG teams to assess if these policies meet our Supplier Minimum Standards. This approach is reflected in the Modern Slavery Guidelines and the amendments to the relevant policies were approved, and will be implemented, in the FY25 reporting period.

## Processes and implementation

We consider that strong internal processes for identifying modern slavery risk are an important measure of effectiveness. While technology assists us to manage our supplier data base and inherent risk measures, it only goes so far. Strong human oversight is important and our due diligence process includes a manual review of supplier risk assessments.

The value of this human intervention, and strength of our processes, was demonstrated this year as industry standards used by our technology provider were updated within the cloud-based supply chain management platform with the impact of changing the risk rating for several industries and jurisdictions. This impacted how our suppliers were rated, including a number of higher risk suppliers, and required a significant level of reconciliation and confirmation to ensure appropriate levels of assessment had been applied across our supplier database. Without strong and effective systems and processes these anomalies may have gone unnoticed and unassessed, with consequential decrease in visibility across the supply chain.

## Awareness raising

To be effective at addressing modern slavery risk requires a community-wide effort. Our strong engagement with our clients, industry and community on modern slavery issues is recorded in the section titled **Building understanding** on page 19. While it is difficult to quantifiably measure the effectiveness of these communications, it is notable that requests for information, presentations and enhanced learning opportunities among the broader Corrs community indicates a willingness to learn and engage on issues related to modern slavery and the associated risks.

For example, the insights listed on page 20 were viewed over 10,000 times in total.

## Consultation

The Boards of Corrs Chambers Westgarth and Corrs Support Services Pty Ltd are responsible for overseeing the Corrs Group's modern slavery governance and approving this Statement.

The SWG is responsible for advising on the development and implementation of policies and processes designed to address modern slavery risks in our operation and supply chain, as described throughout this Statement, as well as the day-to-day management of modern slavery risk. The SWG comprises members of the Corrs Chambers Westgarth partnership, senior managers and the Chief Executive Officer of Corrs Support Services Pty Ltd.

In preparing this Statement, we consulted with a range of stakeholders representing Corrs Chambers Westgarth and Corrs Support Services Pty Ltd in relation to the identification of our modern slavery risks, our actions to assess and address those risks, evaluating the effectiveness of those actions and preparing this Statement. Relevant stakeholders included members of the SWG, legal professionals in our Responsible Business and ESG practice group, relevant personnel in our Papua New Guinea office and business services personnel from our events, administration, communications and technology teams.

## Approval


Corrs makes this Modern Slavery Statement in accordance with section 14 of the *Modern Slavery Act 2018* (Cth) and constitutes Corrs' modern slavery statement for the financial year ended 30 June 2024.

This Statement has been approved by the Board of Corrs Support Services Pty Ltd on Tuesday 3 December 2024 and the Board of Corrs Chambers Westgarth on Friday 6 December 2024.



Stephen Price

Partner and Chair of the Board  
Corrs Chambers Westgarth



Gavin MacLaren

Senior Partner and CEO  
Corrs Chambers Westgarth  
Director  
Corrs Support Services Pty Ltd

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