

Modern Slavery Statement

1 July 2021 – 30 June 2022

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**CORRS
CHAMBERS
WESTGARTH**

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We acknowledge the First Peoples of Australia and their custodianship of Australian lands, including 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.

Message from the Chair of the Board and CEO

At Corrs our purpose is to imagine, inspire and together create a better future.

We believe that by actively working to identify, prevent and mitigate adverse human rights impacts in our own business and with our clients, we can contribute to a more sustainable future. We pride ourselves on working together with our people, our clients and our communities to promote human rights having regard to the UN Guiding Principles on Business and Human Rights and address risks of modern slavery to achieve best practice well beyond regulatory compliance.

During the 2021-22 financial year, we built on our modern slavery framework and bolstered our approach in a number of ways. We introduced technology solutions to help us improve engagement with our suppliers and to increase the effectiveness of our due diligence and procurement processes. It remains difficult to obtain visibility over, and exercise leverage to address, the risks of modern slavery in the lower tiers of our supply chains. This is particularly in high risk jurisdictions and sectors where the operating contexts and regulatory environments limit our ability, and in many cases our suppliers' ability, to obtain and verify supply chain information. We are committed to engaging with our suppliers and continuing to work with them to increase our understanding and due diligence in respect of our operations and supply chain.

Our leadership team is proud of what we have achieved during the last financial year, and while there is always more for us to do we are committed to continuing to build on our work in the years ahead.



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

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**).

The 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 and Orbit Legal Resourcing (referred to as **Corrs, we, us, our** in this Statement). The reporting entities are Corrs Chambers Westgarth and Corrs Support Services Pty Ltd.

This is Corrs' third modern slavery statement, that has been prepared for the financial year of 1 July 2021 to 30 June 2022 (**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.

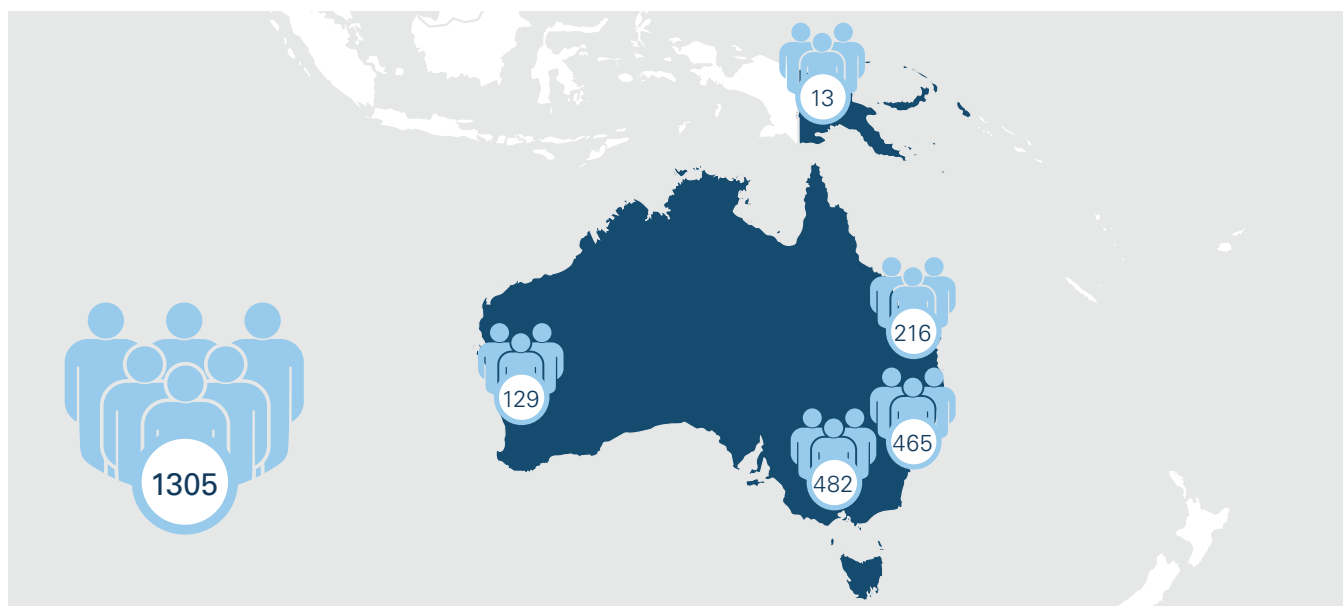
We advise on the most significant global matters and connect with the best lawyers internationally to provide our clients with the right team for every engagement. We are also at the forefront of some of the most high-profile public international law matters in our region, assisting governments and corporations 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.

Our operations

Corrs operates from four offices in Australia (located in Melbourne, Sydney, Brisbane and Perth) and our office in Port Moresby, Papua New Guinea. We employ 1305 employees across our operations.



Legal staff make up 70% of our people and provide legal advice to our clients across 19 practice groups.

Our professional services staff make up 30% of our people. There are a number of business services teams that support our lawyers and clients:

- **Administration** provide 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 the legal matter, from pitches and tenders, to planning, scoping and evaluating the matter.
- **Legal support** comprises our firm-wide network of legal assistants, document production specialists and office assistants, who support our legal staff.
- **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 IT support and training, data security and cyber risk, and developing and maintaining the systems and technologies that support our delivery of legal services.

Orbit Legal Resourcing is a wholly-owned subsidiary of the Corrs Group and is responsible for identifying resourcing solutions for clients and managing a network of legal contractors to fulfil temporary legal needs of our clients.

Telesto Legal & Technology Pty Ltd (**Telesto**) is another Corrs Group wholly-owned subsidiary which provides e-discovery and forensic services. Telesto's services supplement Corrs' own legal technology services offering, using commercially available cloud computing and cloud storage.

Our supply chain

Corrs’ supply chain consists of goods and services that support our provision of legal and professional services across Australia and Papua New Guinea.

Our greatest expenditure is in remuneration, and thereafter our supply chain is predominantly related to expenditure that provides the infrastructure, facilities and other support required to enable the delivery of our services.

The suppliers within Corrs’ supply chain have been more precisely categorised since the last financial year, as we introduced more detailed analysis of our suppliers during this Reporting Period. Our first tier suppliers remain predominantly based in Australia.

We engaged additional suppliers for construction, engineering and building services as part of our recent Sydney office relocation and fit-out. Furniture and other goods procured for the office fit-out were required to be locally-sourced where possible, taking into account supply chain delays as a result of the COVID-19 pandemic.

Our Papua New Guinea office predominantly procures goods and services from the suppliers that service our Australian operations. For example, our Papua New Guinea office procures laptops, AV equipment, corporate travel management services and printing services from our Australian-based suppliers. However, our Papua New Guinea office also procures some goods and services from local suppliers. These include office cleaning services, corporate transport, printer maintenance services and mobile phones and data services.

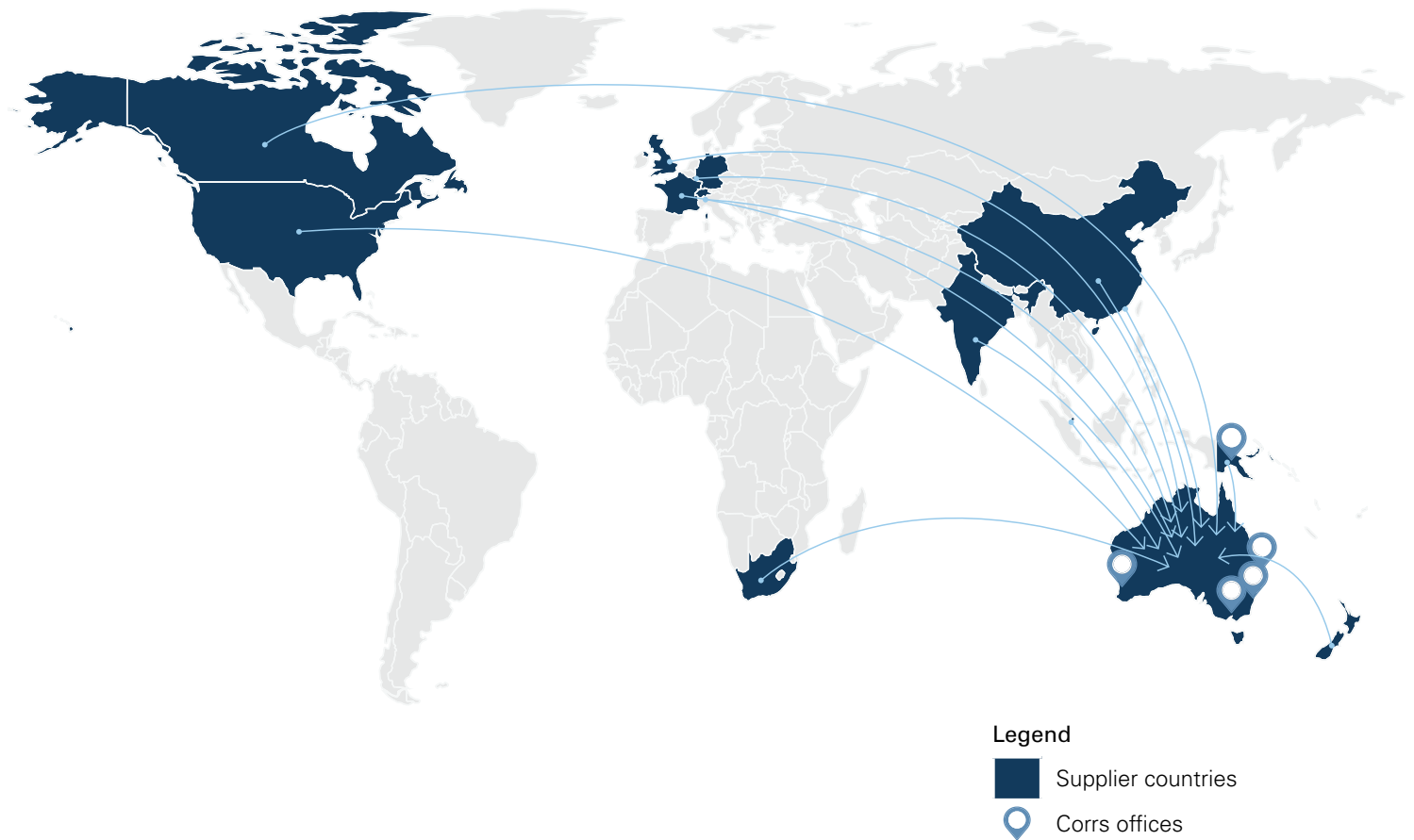
Some of our first tier suppliers in Australia source goods or services from overseas, including from jurisdictions known to present a higher risk of modern slavery according to the Global Slavery Index (GSI), including China, the Philippines and Papua New Guinea.¹

Our key supply chain categories include:

-  Facilities
-  Technology and hardware
-  Travel and accommodation
-  Information management
-  Marketing and merchandise
-  Finances and insurance
-  Personnel
-  Education and services
-  Hospitality
-  Professional services
-  Transport and logistics

1 Global Slavery Index 2018, available [here](#).

The map below illustrates the main countries from which our first tier suppliers source or procure goods and services.



Assessing and addressing risks of modern slavery

Assessing our risks

The supplier categories we assessed as high risk for modern slavery during the Reporting Period are consistent with those identified in our previous modern slavery statement. In addition, we have assessed our suppliers operating in Papua New Guinea as a high risk supplier category.

During the Reporting Period, we strengthened our modern slavery risk assessment process and continued to apply a human rights risk-based approach to assessing the risks of modern slavery in our supply chain. Given that our risk focus areas remained largely static, our risk assessment activities in this Reporting Period were directed at deepening our understanding of these risks, and identifying how commonly understood modern slavery risks manifest for our suppliers in these high risk categories.

The United Nations Guiding Principles on Business and Human Rights (UNGP) inform our risk assessment activities and establish a process by which we can identify and, in some cases, classify the risks against the UNGPs' 'cause, contribute or directly linked' framework.

Supplier engagement

We operationalised the use of a cloud-based modern slavery supply chain management platform which has enabled us to manage our supplier self-assessment questionnaires (SAQs), assess modern slavery risks in our supply chain and engage with our suppliers as part of our continuous improvement initiative. The platform has enabled us to undertake a thorough assessment of our first tier suppliers, and has also enabled us to extend our oversight to some suppliers in the lower tiers of our supply chain.

This platform assisted us to more precisely map our supply chain, and categorise and assess our suppliers against inherent risks related to jurisdiction and sectors / industries. The process leveraged our existing supplier data, and enabled us to issue SAQs to gain greater understanding of commodity and labour / workforce risks and any steps being taken by our suppliers to address the risks of modern slavery in their operations and supply chains.

During the Reporting Period, we engaged directly with 190 suppliers identified as inherently high risk. Of those suppliers, 41 have completed the questionnaire and a further 24 have engaged with the process. It is disappointing that 125 are yet to respond to repeated reminders. This will remain a challenge and an area of focus for the next Reporting Period. Of the suppliers that engaged with the questionnaires issued by the platform:

- 56% are required to report under the Modern Slavery Act or equivalent legislation in other jurisdictions; and
- over 60% indicated that they had a general understanding of modern slavery risks in their supply chain or that they had undertaken an internal or third-party modern slavery risk assessment on their operations and supply chain.

Addressing key areas of risk

In this Reporting Period, we have chosen to focus on conducting a more detailed analysis of the modern slavery risks arising in the following supplier categories that have an inherently higher risk of modern slavery – facilities, technology and hardware, suppliers operating in high risk sectors in Papua New Guinea and COVID-19 related risks.



Facilities (including cleaning, car parking, security and other services)

General observations

With five offices throughout Australia and Papua New Guinea, and the knowledge that cleaning is a high-risk service sector in Australia and elsewhere,² in this Reporting Period we have focused on identifying and assessing modern slavery risks relating to our cleaning contractors.

This work has occurred across our four Australian offices and we have initiated engagement with our cleaning provider in Papua New Guinea. Cleaning contractors for our Australian offices are provided by the landlords for each of our four commercial tenancies. In Papua New Guinea we engage our cleaning contractor directly.

Specific actions

Cleaning

We engaged with the landlords of our various tenancies and assessed their risks of modern slavery on the basis of a number of measures, including their engagement with the [Cleaning Accountability Framework \(CAF\)](#).³

² Walk Free Foundation, Submission No 91 to Joint Standing Committee on Foreign Affairs, Defence and Trade, Parliament of Australia, *Inquiry into Establishing a Modern Slavery Act in Australia* (May 2017), 10–11.

³ CAF is an independent, multi-stakeholder certification scheme developed to address supply chain risks in the cleaning sector. CAF engages in a **pre-qualification process** with cleaning service providers who voluntarily submit themselves to audits by CAF of their policies, payroll and operations to assess whether the cleaning supplier is complying with labour and anti-slavery laws. CAF engages in a **certification process** with landlords and property managers to audit the cleaning services provided to a property and to certify the entire property as compliant.

Cleaning services suppliers assessment and actions		
Office	Landlord's modern slavery risk management	CAF status of supplier
Melbourne Risk rating: LOW	Landlord has an internal Modern Slavery Working Group with which it consults when engaging in the tender process for cleaning services suppliers. The landlord is also a reporting entity under the Modern Slavery Act	CAF Member and one of only three CAF 3 Star Prequalified Contractor Directors
Sydney Risk rating: Pending	Landlord requires that all contractors are enrolled on the Property Council of Australia (PCA) / Informed365 database and that they participate in the landlord's modern slavery assessment processes. Follow-up questions issued to the landlord to determine how the landlord has assessed the cleaner's responses to the SAQ under the PCA process are waiting a response	Not pre-qualified
Brisbane Risk rating: LOW	Landlord has several CAF-certified buildings in its portfolio and is ensuring that the tender process for cleaning services in the building (underway in 2022) requires all prospective contractors to be compliant with the CAF framework, including using CAF pricing templates	Not pre-qualified but submits a modern slavery statement
Perth Risk rating: LOW	Landlord upholds CAF principles and has a risk-based program in place which includes supplier due diligence and risk assessments. This includes incorporating contractual commitments in respect of conduct and ethics, anti-bribery and corruption, whistleblowing protections, prevention of modern slavery, and human resources and labour guarantees including the right to work, labour hire and procurement processes, and diversity and inclusion practices. Landlord also conducts internal audits to continually assess whether its cleaning and security contractors meet expectations and abide by their contract	CAF Member and working towards certification of buildings in which it operates. Publishes its own modern slavery statement

Other facilities

We remain focused on understanding and identifying any risks that may be present in other areas of work associated with maintaining our offices and facilities, including those responsible for car parking, security and maintaining the plant, equipment and furnishings.

During the Reporting Period we engaged with our external commercial facilities manager, which contracts and manages our catering, copy centre, utilities and energy, and maintenance services suppliers in our Australian offices. Our facilities manager manages over 100 third-party supplier contracts on our behalf and is required to comply with our policies, including the Ethical Sourcing Policy and the Corrs Group Minimum Supplier Standards (**Minimum Standards**).

Our facilities manager implements a global system of ethical procurement, imposing contractual obligations on its suppliers, including that suppliers abide by its global Human Rights Policy and Vendor Code of Conduct, which require suppliers to comply with modern slavery laws and refrain from engaging in modern slavery, forced labour and human trafficking. Our facilities manager also confirmed that its business units and sourcing and procurement professionals are regularly trained to understand, identify and mitigate risks of modern slavery activities, including undertaking due diligence efforts across various parts of its information.

We continue to work with our facilities manager to understand and review their assessment practices across the range of services that it provides and to date no specific modern slavery concerns have been raised with us.



Technology and hardware

General observations

As reported in previous statements, technology and hardware continue to pose risks of modern slavery which are challenging for many businesses. These risks include the operational risks of manufacturing technology and hardware in high-risk jurisdictions, and the raw material risks of conflict minerals and child labour in the mining of critical commodities such as cobalt.

During the Reporting Period, approximately 22% of the suppliers that responded to the supplier SAQ provided us with products using high-risk inputs and raw materials, including batteries, aluminium, cobalt and copper.

We have found it challenging to engage with our technology suppliers with any meaningful leverage, despite the fact that the identification of the inherent modern slavery risks related to the products we procure is relatively straightforward.

Specific actions

Addressing technology-related risks will only be achieved by collaboration between businesses and others making coordinated commitments across sectors and jurisdictions. During the Reporting Period we reached out to multi-stakeholder organisations to better understand the work they are doing to protect the rights of workers in electronic supply chains and to seek a way for us to engage with that work. Unfortunately, some organisations we engaged with do not yet facilitate participation from corporate consumers of electronic goods. In the next Reporting Period, we will explore how the legal industry may be able to collaborate to address modern slavery in technology and hardware supply chains.

We also began working with a not-for-profit pro bono partner to develop an initiative that would provide an opportunity for participating Australian businesses (including Corrs) to mitigate and prevent modern slavery in the sourcing of cobalt. Cobalt is used to manufacture batteries used for electronic devices and to store energy produced by renewable energy sources. The aim of this initiative is to bypass the convoluted and complex supply chains in the electronics sector (as well as the renewable energy sector) to effectively address the risks of modern slavery in the procurement of cobalt. We will continue to develop and progress this initiative and engage with our business partners to increase participation in the coming Reporting Period.



Suppliers operating in Papua New Guinea

Papua New Guinea is identified as a relatively high-risk jurisdiction for modern slavery in the GSI. Many of our suppliers in Papua New Guinea also operate in sectors and industries that are inherently high risk for modern slavery, including facilities, transport and logistics, and travel and accommodation. We have described how these sector and industry-based risks manifest in our supply chain earlier in this statement.

We do not currently have the level of oversight and transparency of our Papua New Guinea supply chain that we require. Engagement with suppliers in Papua New Guinea is more difficult, in part due to some of our smaller suppliers' limited capacity to respond to requests, compounded by a lack of domestic regulatory and legislative framework that would require them to either monitor, document or audit labour conditions or modern slavery risks in their operations or supply chains, or share that information with us.

However, we have made some progress with our Papua New Guinea suppliers during the Reporting Period.

One of our two transport and logistics providers in Papua New Guinea is a reporting entity under the Modern Slavery Act, which requires them to report on the overall risks in their operations and supply chain, including in their Papua New Guinea operations. Another smaller supplier has in-house policies that stipulate that they will not supply goods or services to countries, their governments, agencies or associated private entities who participate in any modern slavery or human trafficking practices. This supplier has also confirmed that it complies with all Papua New Guinea laws and regulations regarding salaries and allowances for its employees.

Our recent office move means that the building manager of our Papua New Guinea office is the same as the facility manager for our Australian offices. This supplier has confirmed that no contractors or suppliers can be appointed in Papua New Guinea unless they meet all of the facility manager's procurement protocols in respect of modern slavery, as well as the facility manager's own obligations under our Ethical Sourcing Policy and Minimum Standards.

We will continue to work with our Papua New Guinea suppliers to encourage engagement and completion of the supplier SAQ, as well as monitor compliance with our Minimum Standards and Ethical Sourcing Policy.



COVID-19 related risks

As the COVID-19 pandemic persisted, consequential human rights and modern slavery risks continued to be prevalent. These risks included sourcing Personal Protective Equipment (PPE) and cleaning materials that have been linked to high risks of modern slavery, and the impact of ceasing, restarting and changing the service provision requirements for facilities management and cleaning service providers in our offices in response to varying health orders and restrictions.

During the Reporting Period, we significantly decreased our procurement of single-use PPE products, which mitigated the risks of modern slavery in our operations and supply chain in respect of COVID-19 during the Reporting Period.

Our suppliers also did not raise COVID-19 as being a particular issue for them, consistent with the previous Reporting Period, beyond the ongoing challenges that the current economic climate, and health and safety concerns, continue to influence. For this reason, we did not modify our Supplier Standards Questionnaire to deal explicitly with COVID-19, but continued to implement our modern slavery and ethical procurement policies and protocols.

Governance and management

We have established policies and procedures that continue to underpin our efforts to deepen our assessment of, and responses to, risks of modern slavery. These have been described in detail in our previous modern slavery statement⁴ and include:



Policy and accountability framework



Supplier due diligence



Collaboration and education

Accountability for our policies and processes

Policy	Owned by
Corrs Group Ethical Sourcing Policy	General Counsel
Corrs Group Supplier Minimum Standards	General Counsel
Anti-Bribery and Anti-Corruption Policy	General Counsel
Health and Safety Policy	Chief Operating Officer and Director of People and Performance
Respect in our Workplace Policy	Chief Operating Officer
Gender Equality Policy	Partner Diversity and Inclusion and Chief People Officer
Diversity and Inclusion Policy	Partner Diversity and Inclusion and Chief People Officer
Whistleblower Protection Policy	Ethics and Conflicts Partner

Responsible Business Working Group



During the Reporting Period, our Responsible Business Working Group (RBWG) continued to progress and expand its activities in respect of modern slavery.

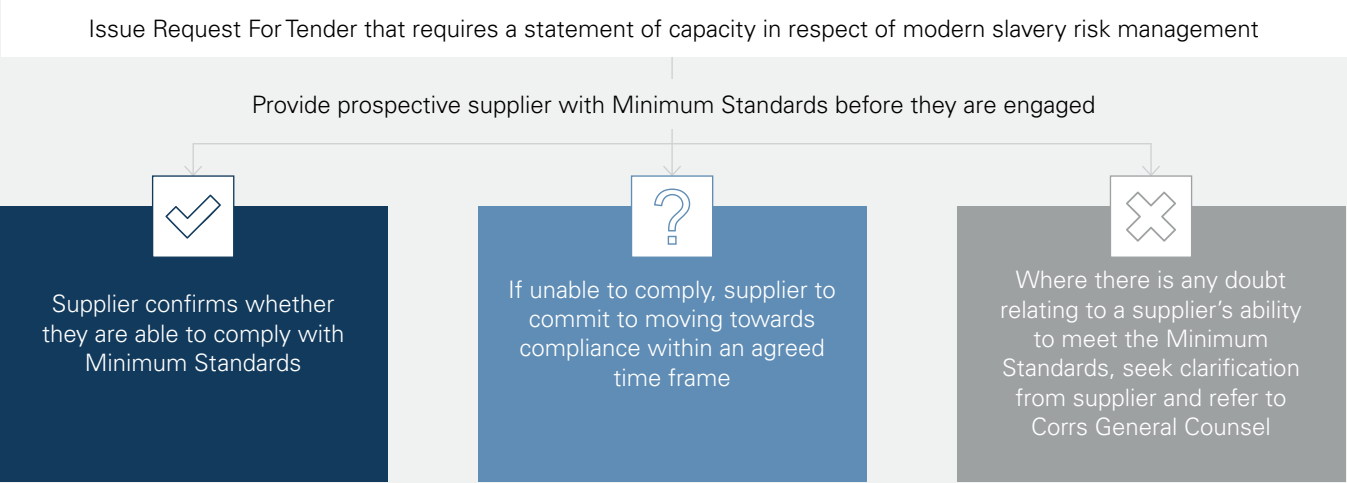
The RBWG includes representatives of the Corrs partnership, and from our business services, including our people and performance and risk and compliance functions. The RBWG meets regularly to review progress against our commitments and targets and to discuss and resolve issues that arise. The work undertaken by the RBWG informs our modern slavery risk assessment and provides oversight of supply chain risks that may arise in different parts of our operations and supply chain.

The Chair of the RBWG reports to the Audit and Risk Management Committee (ARMCO) on the working group's initiatives and activities, and ARMCO will report any material issues to the Board of Corrs Chambers Westgarth. The Board is responsible for approving the modern slavery statement. The RBWG is also assisted by the legal professionals in our Responsible Business and ESG group who have expertise in business and human rights.

⁴ See Corrs Chambers Westgarth, *Modern Slavery Statement 1 July 2020 - 30 June 2021*, p 9.

Contracts and onboarding

Supplier onboarding process



Grievance and remediation

Corrs employees may make an anonymous report of human rights or modern slavery concerns under our Whistleblower Protection Policy. The firm has appointed Whistleblower Contact Officers (**WCO**) who are authorised to receive and action reports, to refer to the General Counsel for investigation and to protect the whistleblower's interests.

If people wish to keep their identity confidential, the WCO will omit their name and signature from the report that is sent to the General Counsel. In the next Reporting Period, we will work with the WCOs to build capacity in responding to modern slavery concerns and victim-sensitive responses. Currently, individuals (including workers in our supply chain) may report concerns directly to a representative of the firm, including our Head of Business and Human Rights, who will consider and address any grievances as part of our commitment to the UN Guiding Principles on Business and Human Rights and compliance with modern slavery legislation.

A formal grievance / complaints system is currently under development as part of continuous improvement of our modern slavery initiatives.

Remediation is a critical part of responding to modern slavery. In this Reporting Period we have been developing a remediation framework that safeguards survivors and aligns to the UNGPs.

We will be finalising and implementing our remediation framework and process and communicating the framework to our suppliers during the next Reporting Period.

During the Reporting Period, our procurement team improved their engagement with our suppliers to ensure all suppliers received the Ethical Sourcing Policy and Minimum Standards at an early stage in the tendering and contractual process. This improvement ensures that suppliers are aware of our commitments to mitigating and preventing modern slavery, and of our expectations in respect of their requirement to apply our Minimum Standards to their operations and supply chain from the beginning of their engagement with us.

Early engagement also enables us to have frank conversations to educate our suppliers on the requirements contained within these documents.

In the next Reporting Period, we will carry out further training with members of our staff with responsibility for procurement activities to address recent developments in the nature of modern slavery risks and increase capability in engaging with suppliers when using our risk management tools.

Collaboration and education

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 business and human rights more broadly.

During the Reporting Period, Corrs expanded its external engagement with industry and civil society, as well as its internal education on modern slavery.

External collaboration

Corrs continues to be at the forefront of community and stakeholder engagement with modern slavery. During the Reporting Period, we:

- **Continued our membership of the United Nations Global Compact Network Australia (GCNA) 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 RBWG as well as other members in responding to increased regulatory movements on modern slavery and human rights due diligence.
- **Collaborated with the Australian Red Cross.** We began working with the Australian Red Cross to develop a deeper understanding of remediation obligations, to inform remediation frameworks that safeguard survivors and meet organisations' legal obligations.
- **Collaborated with international law firms to establish a Business and Human Rights Lawyers Association (BHRLA).** The intent of the BHRLA is to facilitate capacity building, thought-leadership and industry collaboration for law firms advising on business and human rights issues.
- **Collaborated on an international NGO initiative to address child labour in cobalt mining.** We are partnering with an international NGO to explore initiatives to address child labour in artisanal cobalt mines in the Democratic Republic of the Congo.
- **Reviewed the Modern Slavery Act's implementation.** We hosted business consultations facilitated by the GCNA and the Attorney-General Department as part of the review of the Act.

Education

Corrs is committed to contributing to the ongoing modern slavery dialogue in Australia and the education of our clients and the Australian business community.

During the Reporting Period, we launched two insight collections, [*Frontier Sustainability: Navigating environment and climate-related risks and opportunities*](#) and [*The Transparency Era: Perspectives on an evolving commercial landscape*](#), both of which include insights in the form of articles, publications and podcasts on responsible business and ESG issues, including new and emerging modern slavery risks and regulation.



Events and training

During the Reporting Period, we delivered, participated in or facilitated the following education events on modern slavery and its human rights impacts in partnership with clients, pro bono partners and other stakeholders:

- client CPD sessions and presentations on ESG issues and regulation, including modern slavery and the Modern Slavery Act;
- internal sessions on modern slavery for our staff;
- a co-presented session with a local NGO on remediation and legal obligations in respect of modern slavery; and
- various external events and panel discussions considering ESG issues, including modern slavery.

Are we making a difference?

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

Over this and the coming Reporting Period we are focusing on three measures to identify how the modern slavery risk measures are being adopted across the firm:

1. Successful implementation of our Ethical Sourcing Policy and Minimum Standards.
2. Supplier engagement.
3. Internal capacity-building.

Implementing our Ethical Sourcing Policy and Minimum Standards

During the Reporting Period, we were pleased to see engagement with, uptake and implementation of our Ethical Sourcing Policy and Minimum Standards. The tangible impacts of our approach to ethical sourcing and the goal of preventing modern slavery in our supply chain was best demonstrated in the procurement process for our new Sydney office.

The following case study demonstrates how our suppliers and contractors are engaging with our ethical sourcing approach, enabling us to effectively assess and address modern slavery risks in our supply chain.



Case study Sydney office relocation

We ensured that modern slavery requirements were included in our contracts with the head contractor and consultants for the relocation and fit-out of our new Sydney office. To comply with our contractor onboarding process, the head contractor conducted 60 modern slavery review audits on suppliers and all trades engaged on the project. As a result of the audits, the head contractor identified two suppliers that could not demonstrate their ability to meet the anti-modern slavery obligations established by Corrs.

The first was a sisal rug supplier from India, for the inlaid carpet in the café space. The supplier's responses to the head contractor's queries were considered to be evasive so the head contractor removed the supplier from the project and the product was respecified and sourced from a complying supplier. The second case related to part of the specified reception seating furniture. The supplier did not have a website and the head contractor was unable to establish reliable informed contact with the supplier's representative. This supplier was also removed from the project and the furniture was sourced from a complying supplier.

The head contractor and consultants engaged by Corrs understood their obligations to prevent and / or mitigate the risk of modern slavery in their operations and supply chain. Corrs was able to work effectively with the head contractor and consultants to ensure that its anti-modern slavery standards were being effectively implemented and met.

Supplier engagement

We faced significant obstacles in achieving consistent supplier engagement with the technology platform and uptake of our supplier SAQ during the Reporting Period.



190 suppliers engaged

41 suppliers have completed questionnaire

24 suppliers have commenced questionnaire

125 suppliers have not started questionnaire

During the Reporting Period, we followed up with a number of suppliers who had not completed the supplier SAQ in the previous Reporting Period and maintained a detailed register of our efforts to contact each supplier. Wherever possible, we leveraged contract renewals and major purchases to seek responses from suppliers that had not previously engaged.

Some larger suppliers told us they declined to respond to inquiries from individual customers due to the size and scope of their operations. Those suppliers made their modern slavery statements available to us and, in some circumstances, their supplier minimum standards.

We have also had some difficulty engaging our suppliers in Papua New Guinea.

Although the use of the technology platform has provided more precise and detailed management of supply chain information to inform our modern slavery risk assessments, we rely on consistent engagement from all suppliers to ensure the data is accurate. We are committed to increasing our suppliers' awareness and understanding of modern slavery risks and promoting their engagement with our modern slavery policies and protocols in future Reporting Periods to enhance the effectiveness of our risk assessments.

Our communications providing the supplier SAQ and our Minimum Standards have enabled us to engage with smaller suppliers on modern slavery issues and some of them do not have capacity to implement and monitor extensive due diligence programs. To improve the level and quality of our supplier engagement, and assist smaller suppliers with capacity building, we will be inviting our high-risk suppliers to online seminars on modern slavery governance and risk management in the next Reporting Period.

Internal capacity-building

In future reporting periods, we will increase the frequency and extent of training provided to our operations and procurement teams to uplift their understanding of modern slavery and how to implement our ethical sourcing processes. We continue to make our internal modern slavery module available to all employees and we intend to update and expand it during the next Reporting Period.

As part of expanding our internal capacity and mechanisms to assess and address modern slavery, we will be investigating how we can make a grievance process available to our suppliers. During the Reporting Period, we did not receive any reports or complaints of potential modern slavery through our internal whistleblowing processes.

Future endeavours

Actions taken in FY22	Future commitments
Supplier due diligence and engagement	
- Issued Minimum Standards and the supplier SAQ at earlier stages in the contracting process - Used technology platform to engage directly with high risk suppliers - Followed up with suppliers who did not complete the supplier SAQ - Required contractors to issue the Minimum Standards to their suppliers and subcontractors	- Provide accessible seminars on modern slavery risks to high risk suppliers - Continue to encourage our suppliers to adopt modern slavery risk management programs - Engage with suppliers in Papua New Guinea to encourage engagement and completion of the supplier SAQ
Marketing and merchandise	
- Implemented internal ethical sourcing framework - Established internal commitment to only procure low-risk products	Increase monitoring of compliance with ethical sourcing framework
Technology and hardware	
- Reached out to multi-stakeholder technology organisations engaged in rights' protection - Worked with international NGOs to explore an initiative to address child labour in cobalt mining in the DRC	- Engage through legal industry relationships and associations to address modern slavery risks relating to green energy, technology and hardware supply chain - Continue to develop the cobalt initiative and share with the market when appropriate
Governance and management	
Drafted remediation framework	- Finalise and implement remediation framework - Undertake internal training on remediation framework - Communicate remediation framework to suppliers - Explore potential extension of grievance mechanism to suppliers - Training for WCOs on sensitive reporting and complaints management processes
Education and training	
Provided targeted ethical sourcing training to staff	- Further training for the procurement team to address new and emerging modern slavery risks and build internal capability - Update internal modern slavery module
Other activities	
- Became founding member of BHRLA - Provided modern slavery training and presentations to clients - Published insights and podcasts	- Continue engagement with MSCoP and other industry associations - Actively participate in the BHRLA

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 RBWG is responsible for advising on the development and implementation of policies and processes designed to address modern slavery risks in our operation and supply chains, as described throughout this statement, as well as the day-to-day management of modern slavery risk. The RBWG 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 Trust 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 RBWG, 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 its financial year ended 30 June 2022.

This Statement has been approved by the Board of Corrs Chambers Westgarth on Thursday 8 December 2022 and the Board of Corrs Support Services on Friday 16 December 2022.



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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