

Gadens

Modern Slavery Statement

1 July 2023 - 30 June 2024

Introduction

This Modern Slavery Statement (**Statement**) is made in accordance with Section 14 of the *Modern Slavery Act 2018* (Cth) (the **Act**) and constitutes Gadens' Statement for the financial year ended 30 June 2024 (**Reporting Period/FY24**). This Statement covers the Australian business operations of S. Apikian & Others trading as Gadens Lawyers (ABN 29 991 935 627) and its associated entities (collectively **Gadens/firm/we/us/our**).

This is our second Statement and details the efforts made during the Reporting Period to identify, assess and address modern slavery risks across our business and supply chain. This Statement outlines our focus areas for FY25, including the key activities through which Gadens will continue to mitigate the risk of modern slavery in our business and supply chain.



Structure and operations

Our structure and reporting entities

S. Apikian & Others (the **Gadens Partnership**) and Eltav Investments Pty Ltd (ABN 18 652 146 776), which provides business support services exclusively to the Gadens Partnership, operate collectively under the trading name **Gadens**.

We operate exclusively from within Australia, and each entity has its own employees and suppliers. For convenience, any reference to Gadens refers collectively to both entities unless otherwise specified.

Post-Reporting Period events

Effective 1 July 2024, Gadens (Melbourne and Sydney) merged with its associated firm, Gadens (Brisbane and Adelaide) to form one national, financially integrated law firm. In addition, with effect from 1 October 2024, Gadens merged with Canberra-based law firm Trinity Law. As a result of these two mergers (the **Mergers**), for the reporting period that will end on 30 June 2025, Gadens will operate out of offices located in Adelaide, Brisbane, Canberra, Melbourne and Sydney. This Statement does not cover Gadens (Brisbane and Adelaide) nor Trinity Law as these firms were not part of the reporting entity during the Reporting Period.

Our vision and purpose

Our vision is to be widely regarded as a leading independent Australian law firm achieving its purpose of helping our clients succeed in a complex world. Our vision guides our strategy of building a strong culture and promoting future success and provides the ethical framework against which we operate.

Our operations

Gadens is a leading Australian law firm, with our history dating back to 1847.

Our core business function is the provision of specialist legal services to our clients. Our services encompass banking and finance, corporate advisory, disputes and investigations, government, intellectual property and technology (data, cyber, privacy), private clients, real estate and construction, planning and environment, recovery and insolvency, tax, and workplace advisory and disputes.

We provide complex and day-to-day legal services to a range of clients across multiple industry sectors. Our clients include Australian and multinational organisations, small to medium-sized businesses and high-net-worth families and individuals.

At the end of the Reporting Period, we had 460 staff operating from two office locations in the central business districts of Melbourne and Sydney. The majority of our staff are legal practitioners supported by internal business support staff who provide finance, compliance and risk management, information technology, operations and facilities, and people and development services.

Supply chain

As providers of legal services and officers of the courts of Australia, we have a fundamental duty to the administration of justice.

Gadens supports and respects the protection of human rights, and as a firm is committed to achieving the highest standard of behaviour. Our professional obligations to act ethically, diligently and with integrity are reflected in all our business dealings and relationships, and we have the same expectation of our suppliers.

We do not tolerate abusive or unfair treatment of anyone and are committed to taking necessary steps, including in relation to suppliers, to ensure that slavery and human trafficking play no part in our business or supply chain.

Our approach to supplier selection and engagement

The suppliers with whom we do business must deliver products and services of an exceptional quality in a manner that supports our ethical framework and does not compromise our ethical standards.

We recognise that there is a risk we may be connected to modern slavery practices through the activities of our suppliers' supply chains and our decentralised approach to the selection and engagement of suppliers.

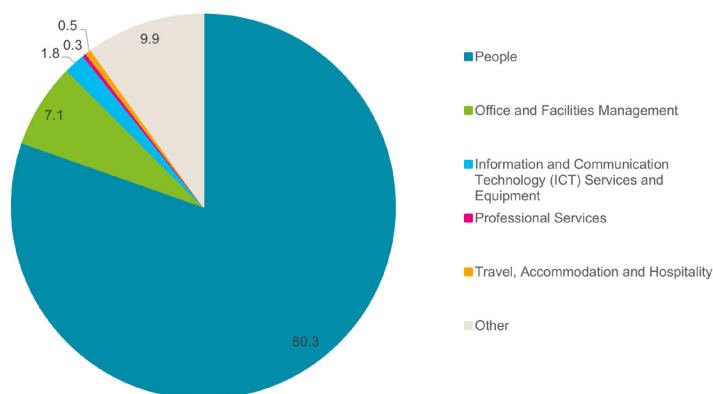
We acknowledge that total eradication of modern slavery risk from our supply chain may never be possible and that our purchasing activities may have various ethical, economic, social and environmental impacts. However, we are comfortable that our assessment of risk is accurate, and our mitigating controls and processes are appropriate for and proportionate to the level of risk. Addressing and mitigating this risk with the goal of eradicating modern slavery in our business and supply chain will remain a continued focus of our activities.

Material supply chain categories

In FY24, Gadens' most significant procurement spend related to the employment of our people. The second largest procurement spend category was for products and services in various functional areas to support our people in the provision of legal services.

A detailed breakdown of these categories is provided in the chart and accompanying table below.

Supply chain categories | Procurement spend %



These categories represent 100% of our total spend for FY24 and is consistent with prior years. There was no material change to our supply chain between FY23 and FY24, or during the Reporting Period.

Functional area	Description of supply
People	The people we employ to deliver a quality service offering to clients or support the delivery of these services. Remuneration paid to our people is the largest expense in our supply chain. All of our partners and staff are over the age of 18 and have Australian working rights.
Offices and facilities management	The commercial office space we lease from top-tier commercial landlords to accommodate our people and operate our business from. This includes fit out costs, maintenance, utilities, cleaning and security.
Information and communication technology (ICT) services and equipment	The systems, software and equipment that are necessary to maintain the technology infrastructure that supports our business. It includes both hardware and software.
Professional services	The services we acquire from others including external training services, external consultants and contractors, recruitment services and legal support services.
Travel, accommodation and hospitality	The service providers we use to organise, book and facilitate our travel and accommodation requirements. This category also includes meals and other hospitality enjoyed by our people while travelling on business as well as client entertainment expenses.
Other	Additional products and services relevant to our business including financial services and insurance, marketing and merchandise, office stationery and legal disbursements. Legal disbursements relate to products and services that we procure from third parties on behalf of clients and the cost of which is 'passed through' to clients as a disbursement at cost (for example, barristers, expert witnesses, title and other searches, registration fees etc.).

Modern slavery risk management

Procurement and supplier governance

Our values bind all our people and underpin everything we do. We have embedded the following policies relevant to procurement and supplier governance into our procedures and workflow:

- Anti-bribery and corruption;
- Anti-discrimination and appropriate workplace behaviour;
- Anti-money laundering and counter-terrorism;
- Compliance with regulatory obligations;
- Conflicts of interest;
- Equitable briefing;
- Gifts, benefits and hospitality;
- Occupational health and safety;
- Overtime;
- Travel and accommodation;
- Workplace bullying; and
- Work experience.

The procurement of high-quality products and services is essential for enabling us to deliver exceptional legal services to our clients. We procure goods and services from a vast number of suppliers, many of which have their own code of conduct unique to that entity and its operations. We seek to ensure our firm interacts with reputable suppliers and contractors who share the same values as ours. We have also sought to align ourselves with suppliers that support our sustainability and social impact vision and goals.

The following processes are followed when considering a potential new supplier:

1. the type of product or service provided;
2. the location of the supplier, including with reference to any sanctions or embargoes;
3. any reputational or other issues available or known about the supplier; and
4. verification of the supplier's commitment to managing modern slavery within their own business and supply chains and/or compliance with applicable requirements.



Identification of modern slavery risk

Gadens acknowledges that the recognition and mitigation of modern slavery risk is fluid and requires ongoing attention. We have taken proactive steps to build upon our efforts during FY23 to identify and manage exposure to modern slavery risks as identified in our inaugural Statement last year.

During FY23, we completed an initial assessment of our business operations and internal procurement and supplier processes to determine our level of modern slavery risk. The assessment involved compiling a list of our current suppliers and completing an initial supplier risk assessment based on the procurement category, type of product or service provided and the location of the supplier's headquarters. We identified and assessed 155 ongoing suppliers across our material supply chain categories.

Our business operations are limited to Australia, and 69% of our supply chain is based in Australia. Of the remaining suppliers, 27% are based in the United States of America or United Kingdom, with the balance (4% based in other countries that are rated as low risk of modern slavery practices by the [Walk Free Foundation's Global Slavery Index \(GSI\)](#). These countries include Canada, Germany, Finland and Ireland. The majority of our supplier relationships are long-standing and we prioritise the engagement of suppliers who are Australian-based.

We did not repeat the assessment in FY24 as there was no material change to our supply chain during the Reporting Period. Given the Mergers completed by the firm in July and October 2024 (see [above](#)), we will conduct this assessment in FY25 as we seek to consolidate, and potentially rationalise, suppliers across our five offices.

Risk exposure

Given the nature of our business and the products and services we procure to support the provision of legal services, the risk that we have caused or contributed to modern slavery in our supply chain during the Reporting Period is low. This view has been formed based on the analysis of our business operations and material supply chain. It also has regard to the regulated nature of the legal services profession in Australia.

We acknowledge the risk and likelihood that our tier-one and tier-two suppliers may source goods and services from international jurisdictions as part of their supply chain thereby increasing the risk of modern slavery, particularly in the ICT sector. To reduce this risk, we prioritise the selection of reputable, Australian-based suppliers who have a verifiable commitment to managing modern slavery risk in their business practices and supply chains.



Actions taken to mitigate modern slavery risk

During FY24, Gadens prioritised the following actions aimed at mitigating the risk of modern slavery occurring within our business operations and supply chain:

- Maintained a list of our current ongoing supplier network, including geographic location, supplier category and type of product or service provided.
- Completed a desktop due diligence of new material suppliers limiting engagement to competent, reputable, and where possible Australian-based, service providers and suppliers.
- Continued risk screening all new suppliers which included financial checks, data security assessments, reference checks, obtaining/sighting of copies of relevant documents, site inspections/audits and/or modern slavery risk assessments. These checks, by necessity, vary based on the industry of the supplier.
- Commenced work on the development of a Supplier Risk and Governance (**SRG**) Program to ensure all new and existing suppliers are regularly assessed for, among other things, modern slavery risk in their supply chain.
- Enhanced our stringent and robust recruitment process, onboarding and people management policies, including primarily sourcing new employees through internal recruitment processes and only using reputable recruitment agencies when required.
- Ensured compliance with all laws and regulations for workplace health and safety and the promotion of flexibility and work-life balance. We have achieved this by, for example, verifying qualifications, experience and, for those within our workforce who are international citizens, verifying their right to work in Australia under approved working visa conditions.
- Required all staff to participate in relevant training programs covering issues and policies related to modern slavery.

Monitoring and measurement

We did not identify any modern slavery incidents during FY24. This evaluation is based on ongoing assessment of our current suppliers, the product and service categories we procure, the locations from which we procure and our current procurement practices.

Our focus on continuous improvement in managing and monitoring modern slavery risk within our supply chain will involve various activities in FY25 as set out below.

Continuous improvement activities

Gadens is committed to continually improving our practices to ensure that there is no modern slavery or human trafficking in our supply chain. For FY25, our focus areas for the mitigation of modern slavery in our supply chain will include:

- Finalising our Procurement Policy for the purchase of products and services. The Policy will set out the minimum standards of behaviour we expect from our suppliers including, but not limited to, the responsible management of modern slavery risk within their supply chains and the procurement of carbon neutral products and services. The Policy will identify areas for consolidation in spending with key suppliers and management of risk in our supply chain.
- Developing, and embedding within the Procurement Policy, a robust Supplier Procurement Risk Framework and an SRG Program for initial and ongoing risk assessments of existing and potential suppliers and contractors. Assessments will involve due diligence screening and scrutinisation of supplier operations including country of origin of goods, services, employees and sources of funding.
- Centralising procurement processes for suppliers within our Operations team. Each Functional Area will have a lead person who will be responsible for ensuring that the procurement of suppliers is conducted through the SRG Program thereby complying with the Procurement Policy and Supplier Procurement Risk Framework.
- Continuing the consolidation of suppliers and contractors nationally as a result of our recent Mergers (see [above](#)).
- Finalising a Whistleblowing Policy outlining the circumstances in which our staff and contractors can safely, anonymously and confidentially make a whistleblowing disclosure, the process that Gadens will follow in dealing with that disclosure and the protections that apply to a whistleblower. The Whistleblowing Policy will also provide an avenue for reporting any suspected instances of modern slavery.
- Including modern slavery as part of Gadens' mandatory due diligence training program for all employees, with modules dedicated to modern slavery awareness and Gadens' Procurement Policy, Supplier Procurement Risk Framework and SRG Program.
- Including anti-modern slavery and human trafficking contractual clauses in all new contracts and agreements for products and services categorised under our SRG Program as high risk.
- Continuing to rationalise our supplier base to reduce risk exposures to modern slavery in our supply chain.

Consultation and approval

This Statement was prepared by the Chief Operating Officer, with support from the Risk and Compliance function in the Office of the General Counsel (**OGC**).

This Statement was approved by the Board of Gadens on 17 December 2024. A copy of the Statement is published on our website, and on the Australian Modern Slavery Statement Register as maintained by the Australian Government's Attorney-General's Department.

For any questions relating to this Statement, please contact the Office of General Counsel via email to notices@gadens.com.

Signed by Jeremy Smith, the Chair of the Board, being the designated and responsible person for each of the reporting entities.



Jeremy Smith

Chairman

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