

# MODERN SLAVERY STATEMENT

November 2024



Bartier  
Perry  
LAWYERS

## A MESSAGE FROM THE CEO

Bartier Perry remains dedicated to respecting human rights and ensuring that all people are treated with dignity. Guided by our core values of 'Diversity and Inclusion' and 'Trust and Respect,' we operate with integrity, striving to promote equality and wellbeing across all facets of our business. Addressing modern slavery is integral to our governance and a core part of our broader Environmental, Social, and Governance (ESG) program.

Through proactive risk management and a commitment to human rights, Bartier Perry strives to make a positive social impact across our business and operations.

I am pleased to present Bartier Perry's Modern Slavery Statement for the 2024 financial year, reflecting our ongoing commitment and progress in this area. Key initiatives during the Reporting Period included:

- distributing our supplier questionnaire to selected first tier suppliers to improve risk visibility
- conducting mandatory training on human rights and modern slavery for all staff
- hosting and presenting complimentary industry seminars (most recently to Property Council of Australia) to share ESG best practices, including strategies to address modern slavery.

During this period, we did not identify any increased risks of modern slavery within our operations or supply chain, and we continue to assess the overall risk as very low.

Moving forward, we remain focused on strengthening our practices and continuously enhancing our approach to managing potential risks, adapting as our firm grows and expands.

We reaffirm our commitment to fostering a supply chain and community free of modern slavery, and we encourage frank conversations with our suppliers and community to address and resolve any issues that may arise.



**Riana Steyn**  
Chief Executive  
Officer



**Andrew Frankland**  
Director and  
Board Chair



# 1. OVERVIEW OF BARTIER PERRY'S MODERN SLAVERY TRACKING

The Modern Slavery Act 2018 (Cth) requires organisations with consolidated annual revenue of more than \$100 million to submit an annual statement (Modern Slavery Statement) describing their actions to identify, assess and address modern slavery risks within their operations and supply chain. Bartier Perry is not required to report under the Act but chooses to do so voluntarily.

This Modern Slavery Statement details information about our modern slavery response during the financial year ended 30 June 2024 (Reporting Period).



### How are we tracking?

Our direct impact in relation to modern slavery practices remained low during the Reporting Period. This is consistent with previous years.

Modern slavery is a pervasive and often-hidden crime that requires sustained vigilance. We continue to implement and develop our risk assessment methodology and processes to identify and, where found, address areas in our operations and supply chain where modern slavery risk may exist. We continue to review and report on our risks as they evolve.

### Our commitment

Bartier Perry remains committed to upholding human rights and acting with integrity for our people and the wider community. Bartier Perry strongly opposes any form of slavery, forced or child labour, and is dedicated to working collaboratively with our suppliers to address and prevent these practices in our business or supply chains.

We continue to implement and develop our due diligence processes to identify and assess the risks of modern slavery practices within our operations and supply chains. In this Reporting Period we conducted compulsory training for staff on human rights and modern slavery and surveyed a selection of our first tier suppliers on their modern slavery practices.



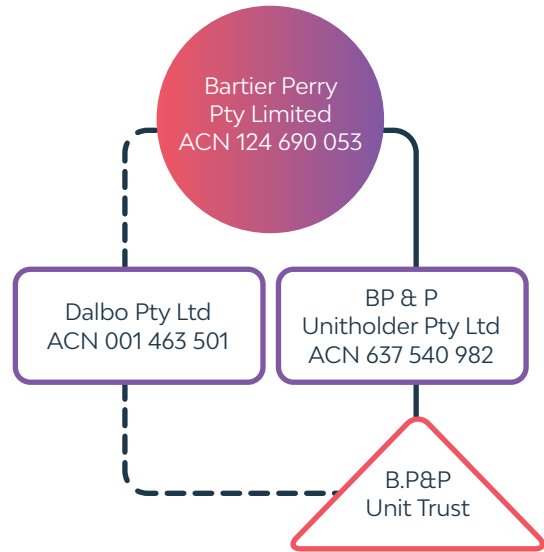
## 2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

### Who are we?

Bartier Perry Pty Limited ACN 124 690 053 is the reporting entity for this Modern Slavery Statement.

We are a commercial law firm based in Sydney with a proud history of more than 80 years.

Bartier Perry is a private company limited by shares. Our structure remained unchanged during the Reporting Period as shown in the adjacent chart.



Based in Sydney, Bartier Perry is a commercial law firm with a **proud history of over 80 years**



**238 staff**

- Legal staff (partners, lawyers and paralegals)
- Management and support staff

### Our operations

Bartier Perry operates out of our offices in the Sydney CBD, New South Wales. Our operations remained unchanged since the last Reporting Period. We continued to directly employ staff in Australia and provide legal services to our clients.

#### Direct employment of staff

On 30 June 2024 Bartier Perry had a total workforce of 238 employees.

Bartier Perry has over 140 legal staff ranging from Partners to Paralegals and the balance of staff provide management and support services to the practice. During the Reporting Period, all our staff were employed in Australia and in accordance with Australian labour laws.



**Provision and delivery of legal services**

Bartier Perry provides personalised legal services to a range of clients from small-to-medium size enterprises, large organisations, government agencies to individuals within a variety of industries including:

- education
- information technology and communications
- government (Federal, State and Local)
- fast moving consumer goods
- finance and financial services
- insurance
- property, building and construction
- charities and not-for-profits
- hire and rental
- private equity
- public utilities and essential services.

Everyone at Bartier Perry is provided with the chance to make a difference in our workplace and community. Staff can get involved at many levels to champion or be part of important initiatives.



**Our supply chain**

The two main categories of goods and services procured during the Reporting Period have remained unchanged from the previous Reporting Periods and include:

1. Products and services provided by our trade suppliers and used by Bartier Perry in delivering our services
2. Products and services provided to Bartier Perry by our non-trade suppliers.

The goods and services procured by Bartier Perry are set out below.

TRADE SUPPLIERS	NON-TRADE SUPPLIERS
Barristers	IT and technology
Hotdocs and precedents	Professional psychological services
Online library services	Marketing
Mediation services	Recruitment services
Electronic signing services	Property and leasing services
	Office operations



**Overseas Suppliers**

During the Reporting Period, Bartier Perry engaged 830 suppliers.

Most of the goods and services Bartier Perry procure are from suppliers and contractors based in Australia.

Our overseas supply chain during the Reporting Period included 17 suppliers who were based in Singapore, USA, UK, New Zealand, Türkiye, Switzerland, Denmark, Ireland, Italy, Germany, Netherlands and France as shown in the map below.

The main products and services procured from overseas during the Reporting Period were software, payroll, writing, marketing and recruitment services.



During the Reporting Period, **98% of our suppliers were based in Australia**

**Location of our overseas suppliers during the Reporting Period**



### 3. OUR MODERN SLAVERY RISKS

In the FY24 Reporting Period Bartier Perry did not identify any instances of modern slavery harm within its operations and first tier supply chain.

As highlighted in our first Modern Slavery Statement (in FY21), we have determined that focusing our modern slavery risk assessment on our operations and first tier suppliers is a practical approach for a firm of our size. We remain steadfast in our efforts to better understand the risks in our operations and supply chain and to identify any other areas representing modern slavery risks.

With the vast majority (98%) of our suppliers being headquartered in Australia, and considering the provision of Bartier Perry's services and that our staff are employed within Australia, it was determined that the risk of modern slavery within our operations and the first tier supply chain remained low.

Bartier Perry's position in relation to modern slavery remains unchanged: practices that constitute modern slavery are serious human rights violations. We know that when multiple modern slavery risks co-exist, this will increase the potential for modern slavery practices to occur. The review and identification of our risk areas form a critical component of our human rights and modern slavery due diligence.

Additionally, we understand that while the risk within our own operations and first tier suppliers remains low (these risks are outlined below), there may be areas within our second and third tier supply chain where the potential for multiple risk factors exists.

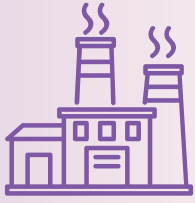


#### Geographic risk level: Low

We continue to view the geographic risk of our suppliers as low given 98% of our direct suppliers are based in Australia. Most of our direct overseas suppliers are based in countries which have a strong rule of law and mechanisms that protect human rights.

We acknowledge that Bartier Perry may be linked to modern slavery practices through our second and third tier suppliers that operate in, or procure goods and services from, nations that report high occurrences of labour and human rights violations and socio-economic factors like poverty and widespread discrimination.





**Sector and Industry risk level: Low**

The sectors that Bartier Perry deals with primarily involve the legal, not-for-profit, finance, education, government and property sectors. These sectors are heavily regulated in Australia and generally allow for reasonable visibility over lower tier suppliers.

We appreciate we may be linked to modern slavery practices further down our supply chain where some of our suppliers operate in, or are connected, to industries that involve low paying, low skilled or hazardous work, such as cleaning industries or are in geographical areas that may have a higher risk of modern slavery.

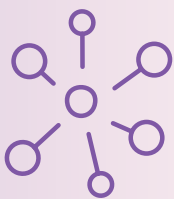


**Product and Services risk level: Low**

Bartier Perry’s core business remains the provision of legal services to clients. If any of our clients were associated with modern slavery, we could inadvertently be linked to such practices through the provision of our services. This risk could be highlighted where we may not have visibility of a client’s business model.

Bartier Perry procures various categories of services including software, payroll, writing, marketing and recruitment.

The workers in these supply chains may be from vulnerable populations, including workers from migrant, low socioeconomic or culturally and linguistically diverse backgrounds. While we consider the modern slavery risk associated with these products and services to be low in our case, the above factors elevate the risk of modern slavery practices.



**Supply chain model risk level: Low**

We continue to assess our supply chain model risk as low based on available information. We have an expanding supply chain, with 830 suppliers during the Reporting Period. We acknowledge the size of Bartier Perry relative to our supply chain makes it difficult to identify and monitor modern slavery practices further down our supply chain. This limitation may pose a risk of indirect association with modern slavery practices.

We acknowledge that Bartier Perry may be linked to modern slavery practices through its second and third tier suppliers that operate in, or procure goods and services from, nations that report high occurrences of labour and human rights violations and socio-economic factors like poverty and widespread discrimination.





## 4. OUR ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

### Due Diligence

Bartier Perry remains committed to preventing modern slavery practices in our operations and supply chains.



We continue to develop and implement processes to identify and track modern slavery risks within our operations and supply chains and this remains an ongoing project.

During the Reporting Period, Bartier Perry continued to employ staff within Australia and in accordance with Australian and international labour laws.

Bartier Perry strives to partner with suppliers who share our commitment to eliminating modern slavery practices and upholding ethical standards. We continue to review our suppliers on an ongoing basis to identify any modern slavery risks. During the Reporting Period we issued modern slavery questionnaires to a selection of first tier suppliers and we continued to seek inclusion of modern slavery clauses in our supplier contracts where possible.



Bartier Perry's Business Risk Register includes modern slavery considerations to promote accountability and visibility at senior levels within the firm. The Business Risk Register is:

- reviewed regularly by the risk owners
- discussed at monthly executive management meetings
- discussed at regular (weekly or fortnightly) one on one meetings between the CEO and Executive Managers as needed/appropriate
- reviewed quarterly by the Business Risk Committee with a report prepared for the Bartier Perry Board.

As our suppliers and supply chains increased during the Reporting Period we continued to expand the development of our supply chain mapping to identify our top suppliers in terms of spend and location. We continue to develop our supply chain mapping to assist us in better assessing our modern slavery risks.



We remain conscious that continuous improvement is at the core of modern slavery due diligence and continue to review and refine our internal processes and methodology to identify how we can better identify, assess and address our modern slavery risks.



## OUR ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS (CONT).

### Remediation

We conducted compulsory staff training on human rights and modern slavery and continued to ensure staff were aware of our Whistleblower Policy during the Reporting Period.

Considering our risk profile during the Reporting Period, we consider our current remediation processes are effective. No modern slavery issues were reported to us during the Reporting Period.

If new risks arise or our risk profile changes, we will update our remediation processes to appropriately prevent or mitigate harm and its recurrence and to provide an avenue of redress for victims affected by modern slavery practices.



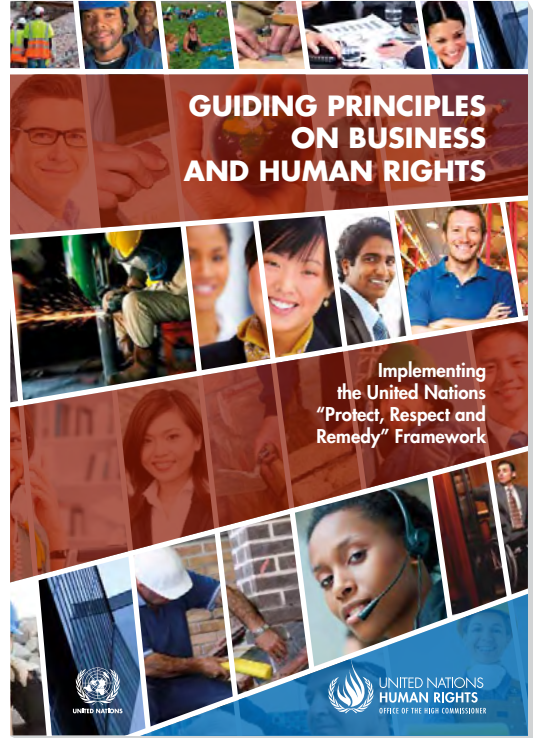
We conducted compulsory staff training on human rights



## 5. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

There were no significant changes since the previous Reporting Periods in relation to our monitoring to assess the effectiveness of our actions. We continue to review and consider how to improve in this area, particularly as our business grows, we engage new suppliers, and the risks of modern slavery occurring in our supply chain and operations evolve.

We continue to be guided by the fundamental human rights due diligence principles espoused in the United Nations Guiding Principles on Business and Human Rights. As such, the internal reporting processes we implement to assess the effectiveness of our actions aims to integrate both appropriate qualitative indicators such as reviews, surveys and audits and quantitative indicators such as key performance indicators.



## 6. PROCESS OF CONSULTATION

Consultation with our group entities was not necessary in the preparation of our Modern Slavery Statement as our group entities had limited to no trading activities during the Reporting Period.



## 7. ANY OTHER RELEVANT INFORMATION

### Continuous improvement: looking to the future

Bartier Perry remains aware that modern slavery risks are pervasive and even though our risk profile again remained low during the Reporting Period, modern slavery practices and risks may present themselves further down our supply chain within the operations of our second and third tier suppliers.

Our effort in combatting modern slavery is an ongoing process which is constantly evolving and requires continuous improvement.

We acknowledge the continued importance of education and helping others to understand the risks of modern slavery. During the Reporting Period, we made several efforts to raise awareness about the risks of modern slavery practices with our staff, clients and suppliers through:

- conducting staff training on human rights and modern slavery
- hosting a free seminar for our clients and networks on ESG compliant strategies
- publishing modern slavery articles online and circulating them to our clients
- our ongoing commitment to ESG which includes identifying risks of modern slavery and our efforts to address those risks
- distributing our supplier questionnaire to a selection of first tier suppliers
- participating in workshops with others in our industry to discuss modern slavery risks and issues in our industry
- updates and notices published on Bartier Perry's intranet 'Birrong' which inform staff on important issues including modern slavery.

In FY25, we aim to reinforce ethical practices and remain vigilant in our efforts to prevent and mitigate modern slavery throughout our operations and supply chains. Our top priorities for this upcoming Reporting Period are:

- the appointment of a dedicated and senior Risk and Compliance Manager to increase our capacity and capability in this area, and to ensure a deeper focus on business risk.
- conducting an annual review of our human rights policy, procurement policy and other related policies to ensure they reflect the latest industry standards and best practices.
- continuing to monitor and evaluate the modern slavery practices of our existing first tier suppliers and new suppliers.
- educating employees to help them identify potential risks and understand the signs of modern slavery.
- sharing periodic updates on our anti modern slavery efforts with both employees and the public.



For queries relating to this statement:

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