

# Maurice Blackburn Statement on Modern Slavery and Human Trafficking

For the period 1 July 2021 to 30 June 2022



maurice  
blackburn  
lawyers

# Reporting Entity

This Statement is made on behalf of Maurice Blackburn Pty Limited (ABN 21 105 657 949), the reporting entity under the *Modern Slavery Act 2018* (Cth) (**Act**), and this statement is made pursuant to section 13. It includes voluntary statements from the following entities as they operate under the same corporate policies and values as Maurice Blackburn:

- Zabulon Pty Ltd (ABN 50 005 114 670)
- Claims Funding Australia Pty Ltd (ACN 158 551 967)
- Zabulon Holdings Pty Ltd (ABN 128 858 113)
- Maurice Blackburn SA Pty Ltd (ABN 641 011 216)

This statement covers the reporting period of 1 July 2021 to 30 June 2022.

Maurice Blackburn Pty Limited is an incorporated legal practice and its shareholders control a sister corporation, Zabulon Pty Ltd (ABN 50 005 114 670) (**Zabulon**). While Maurice Blackburn Pty Limited employs legal professionals, Zabulon is the entity that employs the administrative and support staff that facilitates Maurice Blackburn's essential business functions.

For the purpose of this statement, 'Maurice Blackburn', 'we' and 'our' collectively refers to Maurice Blackburn Pty Limited (ABN 21 105 657 949) and Zabulon.

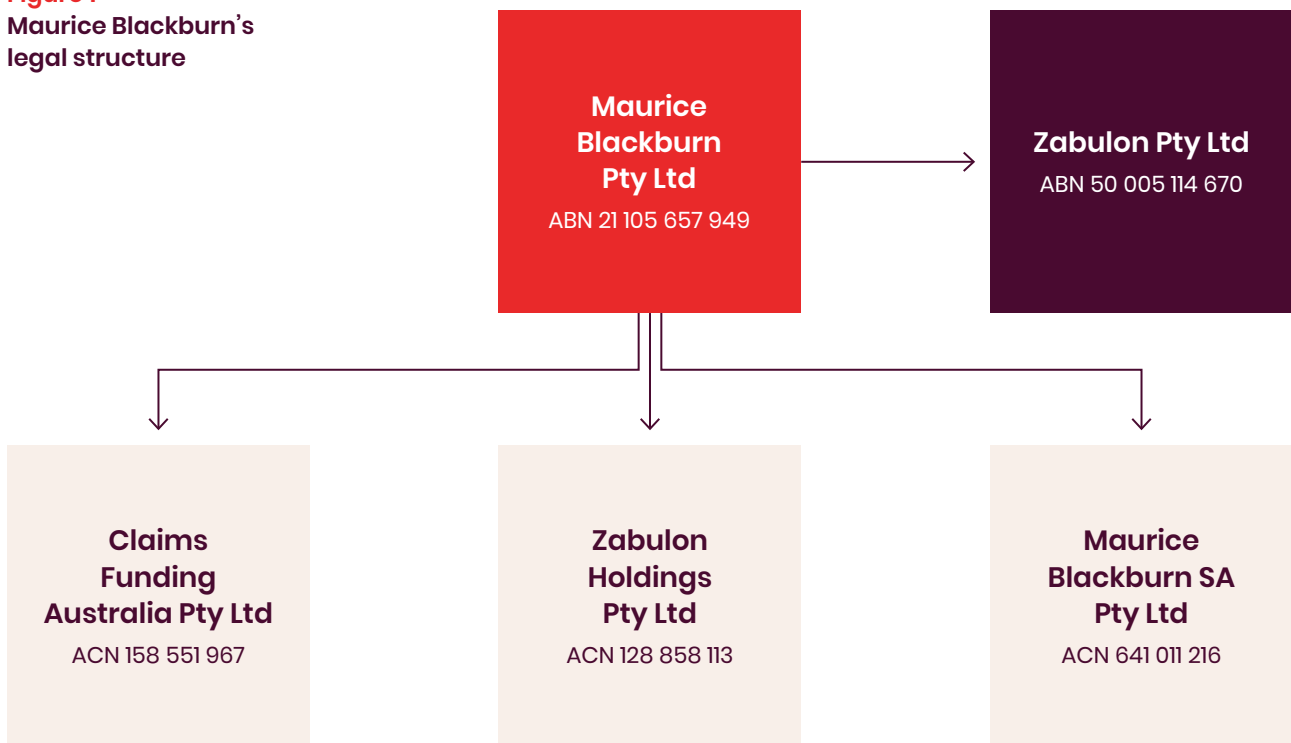


# Structure, Operations, Supply Chain

## Structure and Operations

Our structure is as follows:

**Figure 1**  
Maurice Blackburn's legal structure



Maurice Blackburn is a national firm with over 30 offices throughout Australia and more than 1,100 of the country's best and most respected legal professionals. We provide accurate and confidential advice without unnecessary legal jargon, and we recognise the varying financial circumstances of our clients and offer a flexible fee policy.

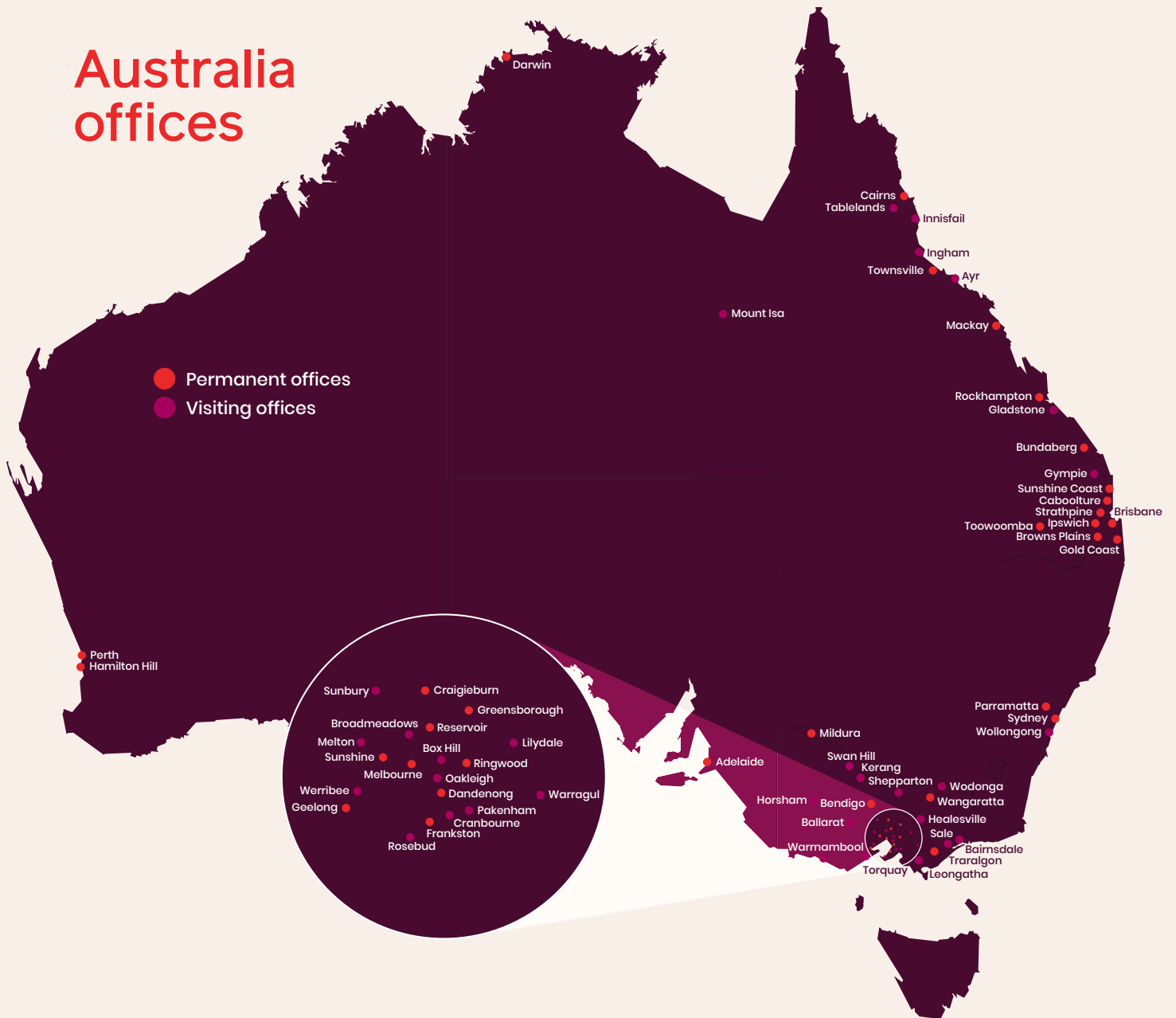
**We treat every client who walks through our door with the sincerity and respect they deserve.**

We provide a range of professional legal services including:

- Personal injury law;
- Class actions;
- Superannuation and insurance law;
- Financial services disputes;
- Wills and estates;
- Employment law; and
- Social Justice Law.

Our offices are located in Victoria, New South Wales, Queensland, Western Australia, South Australia and the Northern Territory.

# Australia offices



Maurice Blackburn owns three subsidiaries:

Subsidiary		Office location
<b>Claims Funding Australia</b> (ABN 158 551 967)	Litigation funding company.	Australia
<b>Zabulon Holding Pty Ltd</b> (ABN 128 858 113)	A holding company established to hold shares for Claims Funding International.	Australia
<b>Maurice Blackburn SA Pty Ltd</b> (ABN 641 011 216)	Entity established for trust purposes.	South Australia

## Supply Chain

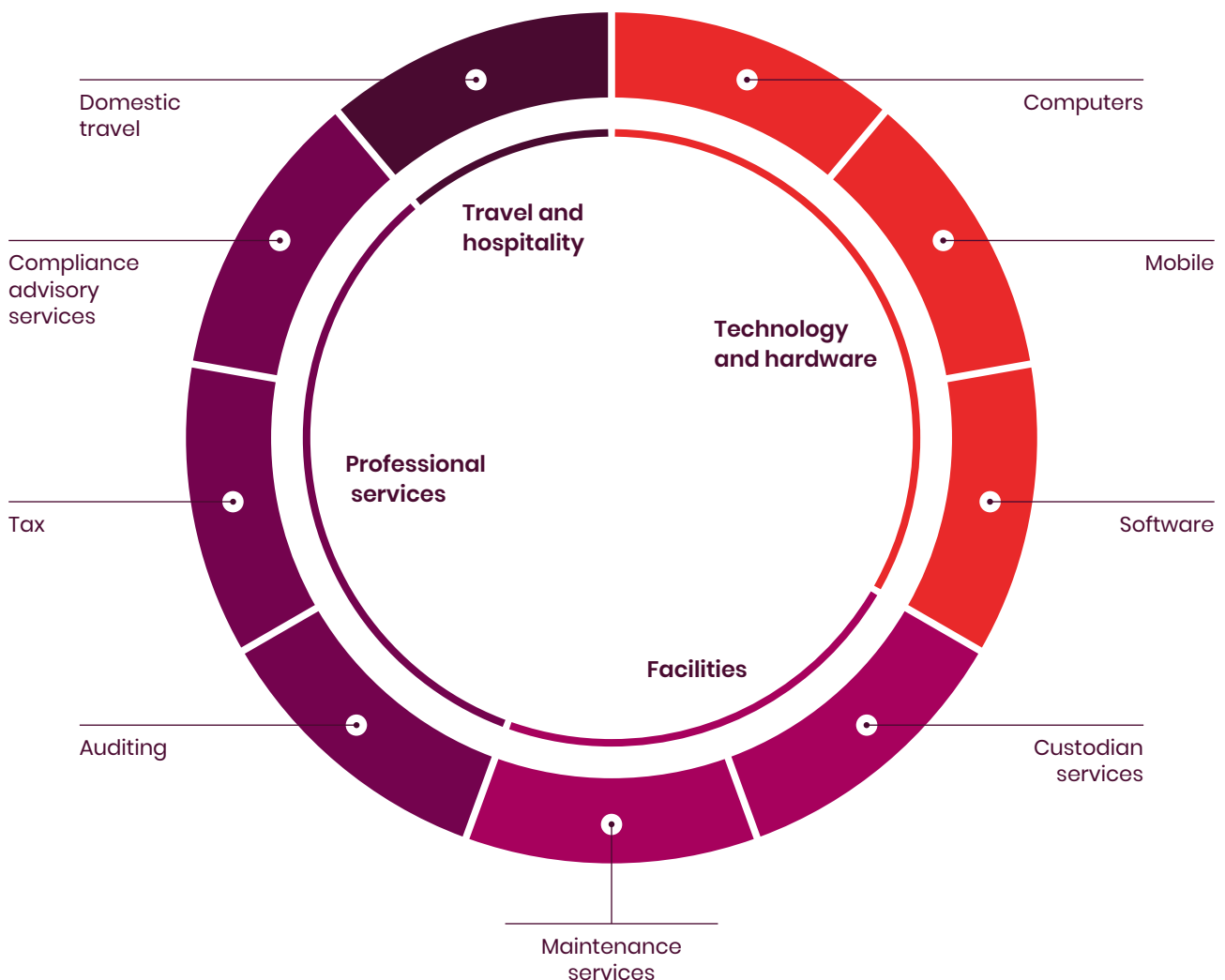
For our third-party engagement, the firm values trusted partnerships and prioritises maintaining long term relationships with suppliers that are fair and honest in their conduct. While procurement activities are conducted by either Maurice Blackburn or Zabulon, they are generally managed by Maurice Blackburn's Finance department.

At Maurice Blackburn, we engage professional services companies to provide essential business services, such as marketing, insurance, tax advisory and audits. We also procure the necessary services of specialist legal experts, such as barristers, on behalf of our clients.

Zabulon is responsible for maintaining supplier contracts in relation to lease agreements, IT equipment, custodian and maintenance services.

Our vendors are predominately located in Australia with some in the Netherlands, United States, and United Kingdom. The main types of goods and services we procure include:

- **technology and hardware** – computers, mobile, and software purchases;
- **facilities** – custodian and maintenance services for Maurice Blackburn locations;
- **professional services** – auditing, tax, and compliance advisory services; and
- **travel and hospitality** – domestic travel to connect with clients or other legal professionals.



# Modern Slavery Risk Identification

Like most professional service firms, the primary and most complex entry point for modern slavery comes from our supply chain. We are aware that no industry is immune to modern slavery and there is inherent risk in the goods and services procured by our direct suppliers. We engaged an external expert to interview staff across Facilities, Finance, and Marketing to identify potential higher risk supplier relationships including, but not limited to:

## Commercial cleaning services

Including any cleaning, restoration, and general building maintenance that has been contracted by Maurice Blackburn or our building manager. This sector traditionally has higher reports of underpayment and employees using higher rates of subcontracting to avoid paying entitlements and hence is a key focus for our firm in seeking to minimise this risk<sup>1</sup>.

## ICT purchases and offshore software development

Like many professional services firms, to maintain our online platform and online promotions we engage third party professionals to supply hardware and software as a service or one-off product. In a global market, these goods and services can be conducted overseas and within geographies that may not have the same level of labour protections afforded in the Australian workforce, and hence is another key area for vigilance.

## Branded merchandise

Maurice Blackburn may at times procure branded merchandise, including apparel, kitchenware, or novelty goods. It is likely that a number of these items or their components are produced overseas, where the risk of modern slavery is greater at assembly and/or manufacturing stages.

<sup>1</sup> INCLEAN MAGAZINE, The industry that's cleaning up modern slavery. Published 23/10/2019 at <https://www.incleanmag.com.au/the-industry-thats-cleaning-up-modern-slavery/>

# Modern Slavery Risk Management

## Employment

We rely on a diverse pool of talented professionals to provide legal services to clients and operate vital business functions. We have an affirmation statement, *About Maurice Blackburn*, which speaks to our values including to “treat others fairly and with respect”. This translates into our ‘all in commitment’ on anti-discrimination and inclusion reflected in our:

**New Starter and Induction Policy**

**Grievance Procedures Policy**

**Change of Employment Conditions Policy**

**Contractor Management Policy**

We have implemented and continuously improve our payroll management systems and reporting mechanisms available in-house and through external partners. We believe that these policies, in conjunction with legal profession regulation that exists in the Australian states we operate in, does limit the risk of our workforce being subjected to modern slavery, but we are committed to continuing to take a proactive approach to these issues to ensure this remains the case.

In our practice there is a possibility we would represent survivors of modern slavery, but this is outside the scope of the Act.

## Governance

Our modern slavery initiatives have had the commitment of our senior leaders, Audit and Risk Committee and the Maurice Blackburn Board. Our Risk and Compliance Team and our Modern Slavery Working Group, comprised of key staff, play a central role in the governance, implementation and monitoring of our modern slavery response.

## Operations Assessment and Strategic Plan

The findings of our operations risk assessment, undertaken by an external expert, assisted the development of Maurice Blackburn’s modern slavery strategic plan. The plan ensures activities, timelines and accountabilities are well articulated across the organisation so that we continue to address modern slavery risks. The Risk and Compliance Team continues to drive the delivery of the plan.



## Policies

Maurice Blackburn maintains two reporting mechanisms for employees to raise grievances and concerns:

Whistleblower Policy	Grievance Procedure Policy
Intended for internal and external reporting at Maurice Blackburn to submit reports of potentially criminal or unethical behaviour	Internal reporting at Maurice Blackburn to raise issues of management and personal grievances
The Policy is publicly accessible <a href="#">here</a>	Policy is available to staff on the intranet
Eligible whistle-blowers are encouraged to report concerns without fear of retaliation	Employees are encouraged to file a grievance when informal resolution tools have been exhausted
People and Culture team will investigate the report and the issue and may determine if corrective action is required.	People and Culture team will investigate the grievance and may determine if remediation is required.

**Both policies are owned and operated by Maurice Blackburn's People & Culture Team**

During the reporting period we reviewed and updated our Whistleblower Policy to incorporate modern slavery reports. This policy provides a suitable communication channel for victims or interested parties to anonymously raise a modern slavery related grievance that has occurred either within our workforce or supply chain. We also commenced developing a resource to guide the firm when responding to modern slavery reports.

Activities were undertaken during the period to raise awareness of these policies through a variety of communication channels. This included publicising through the firm's intranet, on employee payslips and signage in the firm's offices. We plan to continue further raising awareness of these policies in the next reporting period.

Maurice Blackburn's policies are a key method for setting out expectations for our people, in the responsible conduct of the firm. We have a number of policies in place which reflect our firm's belief that ethics and integrity are fundamental in doing business. During this period, we either introduced or updated and republished the following:

- Anti-fraud, Theft and Corruption Policy: which sets out rules with regard to minimising risks of bribery and corruption.
- Purchasing Policy: sets out the firm's expectation of ensuring we maintain the highest ethical standards when dealing with suppliers.

During this period, we commenced developing a Procure to Pay Policy, which will apply to all employees engaged in the procurement of goods and services for the firm. The policy seeks to ensure we have consistency in our approach towards procuring goods and services. This policy will set out our expectations of suppliers and addresses modern slavery in the supplier assessment process. The firm also commenced developing a Human Rights Policy which will formalise our commitment to act responsibly in the conduct of our business and also seek to make a positive impact in the societies we work. We plan to continue developing these policies in the next reporting period.

**We continue to review and adapt our policies as we learn more about our supply chain.**



## Supplier Management

We continue to seek supplier agreement to our standard supplier contractual terms which includes warranties that the supplier will comply with the Act and responsibly manage the risk of modern slavery within their own supply chain.

During the reporting period we continued to conduct supplier due diligence. We developed a Modern Slavery Due Diligence Questionnaire which will allow Maurice Blackburn to gain a deeper understanding of the activities our suppliers undertake to comply with modern slavery obligations, as well as assisting us to assess modern slavery risk in our own supply chain. We undertook further due diligence of our higher risk supplier relationships beginning with Maurice Blackburn's commercial cleaning suppliers. We have continued to progress this project with our other high-risk supplier relationships during FY23.

We also commenced a review of our Procurement Framework. Our new Procurement Framework will guide the firm in a way that ensures ethical behaviour, efficiencies, accountability and compliance with all applicable regulations, laws and policies including the Act, when sourcing goods and services. As part of this Framework we began developing a third party risk matrix and a third party due diligence questionnaire, which includes questions pertaining to modern slavery. Once this is implemented, it will assist the firm in helping to address various risks with our third parties, allow us to take a proactive approach to engaging and onboarding new third parties and allow us to mitigate modern slavery within our supply chain before engaging we engage with the prospective third party.

**As our modern slavery response matures, we will continue to take steps to assure our trust in vendors with practical due diligence stages and direct, honest engagement with our suppliers.**

## Awareness and Education

Maurice Blackburn's executive team and Audit and Risk Committee have been presented with the requirements of the Act and the actions the firm plans to undertake to address modern slavery.

**To improve awareness of modern slavery risks, we continue to require all new employees to review and be familiar with the firm's policies.**

# Assessing effectiveness

We assess the effectiveness of our actions in several ways:

- tracking our actions and the outcomes of our actions under the strategic plan to demonstrate continuous improvement to our modern slavery response
- monitoring for any reported incidents of modern slavery within our organisation and supply chain
- undertaking reviews of our policies and procedures with regards to modern slavery
- aiming to increase awareness of our relevant policies and procedures on an ongoing basis, and
- the number of people who have completed modern slavery training.

In the upcoming reporting period, we will:

- continue with supplier due diligence
- update our third party risk management processes, including in relation to modern slavery risks
- continue to raise awareness of our Whistleblower Policy and relevant reporting lines
- continue to progress the development of relevant policy documents to ensure they can respond to modern slavery
- continue to develop a document that provides resources and guidance on responding to modern slavery reports within our organisation, and
- conduct internal training to raise awareness of suppliers and modern slavery risk management processes.



# Consultation

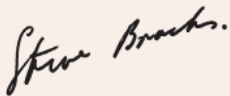
Maurice Blackburn recognises the importance of engaging with its subsidiaries on its risks of modern slavery. During the reporting period, Maurice Blackburn shared copies of its inaugural modern slavery statement and modern slavery strategy with the managing director of Claims Funding Australia and International. Managing directors of subsidiaries will be contacted by the Maurice Blackburn modern slavery working group to report on any new initiatives or changes in approach regarding modern slavery risk management.

# Other

At Maurice Blackburn, we believe our employees can be agents of positive impact and change on clients and the community. We believe that raising awareness and empowering people through knowledge creates small impacts in the workplace and our employees' personal lives which in turn can have a cascading effect across communities and Australia.

In addition to our legal services, Maurice Blackburn openly engages with the federal parliament, departments and agencies on labour rights, regulation and standards within Australia to provide legislatures with case studies and insights from front line workers.

This statement has been approved by the Board of Maurice Blackburn on 7 December 2022.



**Steve Bracks**  
Chair of the Board  
**Maurice Blackburn**

