



# Modern Slavery Statement

1 July 2024 – 30 June 2025

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

CORRS  
CHAMBERS  
WESTGARTH



# Contents

|                                                       |    |
|-------------------------------------------------------|----|
| Message from the Chair of the Board and CEO           | 1  |
| Reporting entity                                      | 2  |
| About Corrs                                           | 2  |
| Mandatory reporting criteria                          | 3  |
| Our structure and operations                          | 4  |
| Our operations in detail                              | 5  |
| Our subsidiaries                                      | 5  |
| Modern slavery risk governance and management         | 6  |
| Policy framework                                      | 6  |
| Governance and responsibility                         | 7  |
| Modern slavery risk in our operations                 | 8  |
| Our supply chain                                      | 9  |
| Modern slavery risk in our supply chain               | 11 |
| How we assess modern slavery risk in our supply chain | 11 |
| Key areas of modern slavery risk in our supply chain  | 11 |
| Supplier assessment questionnaires                    | 12 |
| Addressing modern slavery risk                        | 13 |
| Addressing risk through continuous improvement        | 13 |
| Addressing modern slavery risk in our supply chain    | 14 |
| Collaboration and building understanding              | 16 |
| Collaboration                                         | 16 |
| Building understanding                                | 16 |
| Effectiveness of our program of work                  | 17 |
| Internal capacity building                            | 17 |
| Supplier questionnaires                               | 18 |
| Supplier training                                     | 18 |
| Supplier onboarding and contracting                   | 18 |
| Processes and implementation                          | 18 |
| Awareness training                                    | 18 |
| Consultation                                          | 19 |
| Approval                                              | 19 |

---

## Message from the Chair of the Board and CEO

During the 2025 financial year, we focused on the implementation of our Modern Slavery Policy and associated risk mitigation program.

This included the implementation of Guidelines and a Response and Remedy Framework, designed to enhance our organisational capability to identify, prevent and address risks related to modern slavery.

We maintained active engagement with our suppliers to support their understanding of modern slavery risks within their supply chains, and to reinforce their responsibilities in responding to and remediating any instances of modern slavery, should they arise.

While we have made progress, we recognise that addressing modern slavery is an ongoing commitment. We remain dedicated to continuously improving our approach, in alignment with the UN Guiding Principles on Business and Human Rights.



Stephen Price

Partner and Chair of the Board  
Corrs Chambers Westgarth



Gavin MacLaren

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

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

## Reporting entity

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

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

This Statement has been prepared for the financial year of 1 July 2024 to 30 June 2025 (**Reporting Period**).

## About Corrs

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

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

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

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

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

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

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

## Mandatory reporting criteria

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

| Mandatory criteria                                                                                                                                                                                                                | Page number/s |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| a. Identify the reporting entity.                                                                                                                                                                                                 | Page 4        |
| b. Describe the reporting entity's structure, operations and supply chains.                                                                                                                                                       | Pages 5-10    |
| c. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.                                                                               | Pages 11-12   |
| d. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.                                                  | Pages 13-16   |
| e. Describe how the reporting entity assesses the effectiveness of these actions.                                                                                                                                                 | Pages 17-18   |
| f. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement). | Page 19       |
| g. Any other information that the reporting entity, or the entity giving the statement, considers relevant.                                                                                                                       | All pages     |

# Our structure and operations

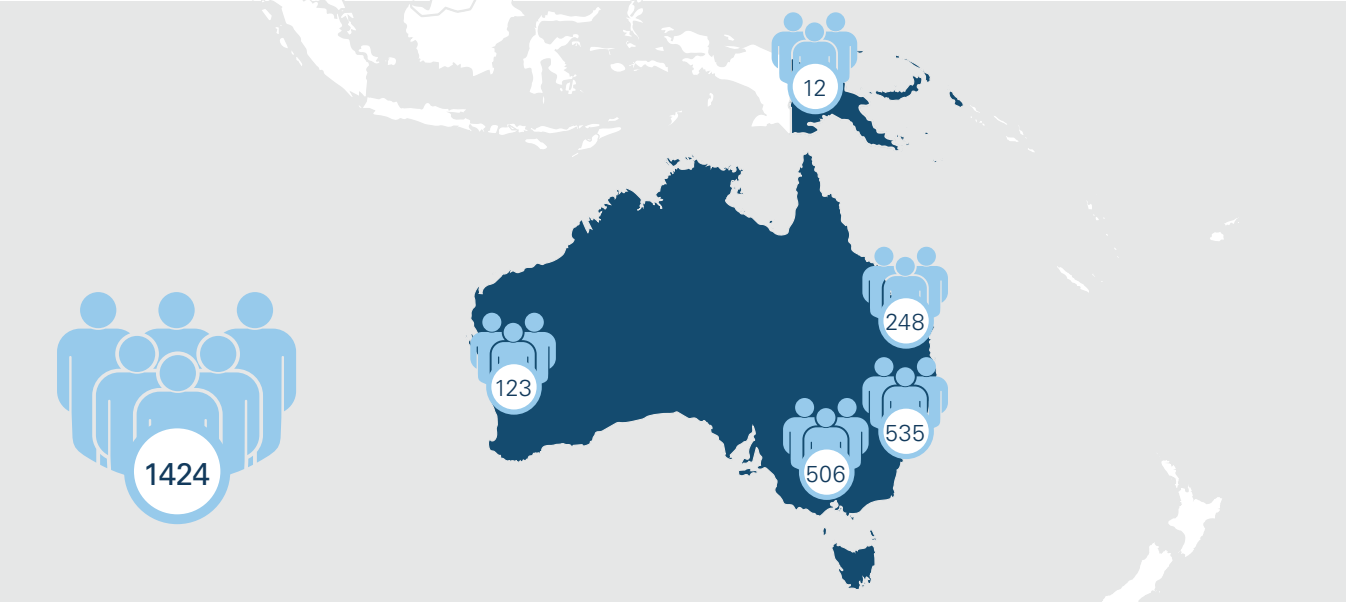
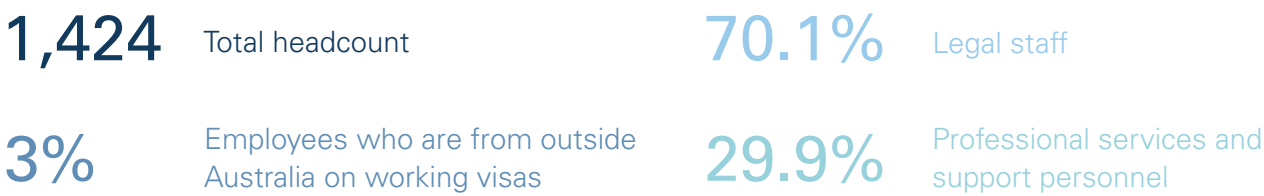
Corrs' operations have largely remained unchanged since the last reporting period.

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

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

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

As of 30 June 2025, we had a total headcount of 1,424 including partners, lawyers, professional services staff and support personnel across our operations. 3% of our employees are from outside Australia on working visas – this group is comprised of lawyers, professional services staff and support services personnel. Legal staff make up 70.1% of our people and provide legal advice to our clients. Our professional services and support personnel make up 29.9% of our people.



Corrs continues to operate its wholly owned subsidiaries namely, Corrs Enterprises Pty Ltd, trading as Orbit Legal Resourcing Pty Ltd (**Orbit**), Telesto Legal and Technology Pty Ltd (**Telesto**) and Corrs Enterprises Holdings Pty Ltd. In March 2025, Garran Advisory Pty Ltd was incorporated. Our operations are outlined in detail on the following page.

## Our operations in detail

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

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

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

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

- **Productivity and Realisation** assist with pricing and billing, as well as monitoring and managing the utilisation and productivity of our people.
- **Risk and Legal Excellence** proactively supports a holistic and coordinated approach to excellence, quality and risk management at all levels of the firm.
- **Technology** is responsible for information technology support and training, data security and cyber risk, and developing and maintaining the systems and technologies that support our delivery of legal services.

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

## Our subsidiaries

Corrs Enterprises Pty Ltd trading as Orbit is a wholly owned subsidiary of the Corrs Group. Orbit manages a network of qualified lawyers from across Australia to provide temporary in-house legal resourcing solutions for Corrs' clients, particularly when needed for an urgent project or to fill a temporary gap in their in-house team. Depending on the clients' needs, Orbit lawyers may be contracted on a full-time or part-time basis and for a period of one week to over 12 months. During the Reporting Period, Orbit had 156 lawyers in its candidate pool.

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

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

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

Garran Advisory Pty Ltd was incorporated in March 2025 to provide advisory services to Australian federal and state governments, to assist and support the development of best practice policy. As at the end of the Reporting Period, the company was taking preliminary steps to commence operations in the new financial year.

# Modern slavery risk governance and management

## Policy framework

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

Our policies are listed in the following table:

| Policy                                         | Purpose and ownership                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Modern slavery and procurement policies        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Modern Slavery Policy                          | <p>Describes Corrs' commitment and provides a framework for identifying, assessing and addressing modern slavery risks within our supply chain and operations. The Policy also allocates responsibility for overseeing the implementation of Corrs' commitment and outlines the avenues for Corrs personnel to raise any concern about modern slavery.</p> <p><b>Owned by:</b> Head of Responsible Business and ESG.</p>                                                                                                                      |
| Modern Slavery Policy Guidelines (Guidelines)  | <p>Supports Corrs personnel to effectively implement the Modern Slavery Policy in the course of their day-to-day responsibilities.</p> <p><b>Owned by:</b> Head of Responsible Business and ESG.</p>                                                                                                                                                                                                                                                                                                                                          |
| Modern Slavery Response and Remedy Framework   | <p>Provides guidance for Corrs personnel when considering or responding to any grievances, concerns or reports received regarding actual or potential incidents of modern slavery in our operations or supply chain. Any concerns are to be referred to the Head of Responsible Business and ESG or the CEO (or delegate). Where appropriate, Corrs personnel may be engaged to address those concerns and, if required, a Modern Slavery Response Team may be established.</p> <p><b>Owned by:</b> Head of Responsible Business and ESG.</p> |
| Contracts Policy                               | <p>Sets out Corrs' requirements for entering into any document that creates legal rights or imposes legal obligations or liabilities on behalf of any entity within the Corrs Group. This includes a requirement for suppliers to confirm that they can meet the Supplier Minimum Standards. Provides guidance on incorporation of modern slavery related clauses.</p> <p><b>Owned by:</b> General Counsel.</p>                                                                                                                               |
| Ethical Sourcing Policy                        | <p>Outlines Corrs' practices for ensuring we meet our ethical business standards when engaging in procurement, including taking into account a supplier's commitments and actions in respect of human rights, diversity and inclusion, First Nations reconciliation, data security and community and environmental impacts of their operations.</p> <p><b>Owned by:</b> General Counsel.</p>                                                                                                                                                  |
| Supplier Minimum Standards (Minimum Standards) | <p>Sets out the Minimum Standards Corrs expects of our suppliers in relation to ethical business practices, labour rights, anti-discrimination, safety and environmental management. This includes the expectation that suppliers do not subject their workers to modern slavery and hold their own suppliers to the same standard.</p> <p><b>Owned by:</b> General Counsel.</p>                                                                                                                                                              |



| Policy                          | Purpose and ownership                                                                                                                                                                                                                                                                                                                                                                                       |
|---------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Other relevant policies         |                                                                                                                                                                                                                                                                                                                                                                                                             |
| Health and Safety Policy        | <p>Sets out our commitment to providing, so far as is reasonably practicable, a work environment that is safe and without risks to the health, safety and wellbeing of Corrs personnel, clients and visitors who work, do business in, or visit our workplaces.</p> <p><b>Owned by:</b> Chief Operating Officer and Chief People Officer.</p>                                                               |
| Respect in our Workplace Policy | <p>Sets out responsibilities to prevent discrimination, harassment, bullying and other inappropriate conduct, outlines relevant behaviours, and explains how to raise concerns and access support. The Modern Slavery Policy indicates that concerns regarding modern slavery can be reported in accordance with this policy.</p> <p><b>Owned by:</b> Chief Operating Officer and Chief People Officer.</p> |
| Risk Management Framework       | <p>Sets out a systematic and comprehensive approach to the identification and management of the firm's business and professional practice risks, and provides a pathway for reporting any identified risks, including modern slavery risks in our operations and supply chain.</p> <p><b>Owned by:</b> Chief of Risk and Legal Excellence.</p>                                                              |
| Whistleblower Protection Policy | <p>Sets out how to raise concerns about suspected serious misconduct without fear of reprisals or victimisation. The Modern Slavery Policy indicates that concerns regarding modern slavery can be reported in accordance with this policy.</p> <p><b>Owned by:</b> Ethics and Conflicts Partner.</p>                                                                                                       |

We did not receive any reports or complaints of potential modern slavery through our reporting processes during the Reporting Period.

## Governance and responsibility

Responsibility for overseeing the implementation of Corrs' modern slavery commitment is shared between various Corrs groups and personnel.

|                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                           |                                                                                                                                                                                                       |                                                                                                                                                                      |                                                                                                                                                                                                                                                                                        |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Corrs' cross-functional Sustainability Working Group (SWG) is chaired by the Head of Responsible Business and ESG and includes representatives from the Corrs partnership and the business services teams. The SWG oversees Corrs' actions across ESG and business and human rights, including modern slavery. | The chair of the SWG reports to the Audit & Risk Management Committee (ARMCO). The chair of ARMCO reports any material issues to the Board of the partnership or CSS (as appropriate) and/or the Chief Executive Officer. | The General Counsel team maintains, reviews and updates the firm's procurement policies, playing a key role in identifying and assessing modern slavery risks in supplier contracting and onboarding. | Boards of the partnership and CSS are responsible for approving our annual Modern Slavery Statement in compliance with our obligations under the Modern Slavery Act. | ARMCO and the Board of the Partnership oversee, review and approve the firm's Risk Management Framework, which includes actions and governance to identify, assess and address modern slavery risks in our operations and supply chain and implement Corrs' modern slavery commitment. |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Modern slavery risk in our operations

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

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

## Our supply chain

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

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



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



Education and knowledge services (many of which also form part of ICT)



Hospitality (such as catering and events services)



Office furniture and supplies / consumables



Merchandise and marketing



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



Human resources and employment services



Business operations (including leasing and facilities management)



Transport and logistics



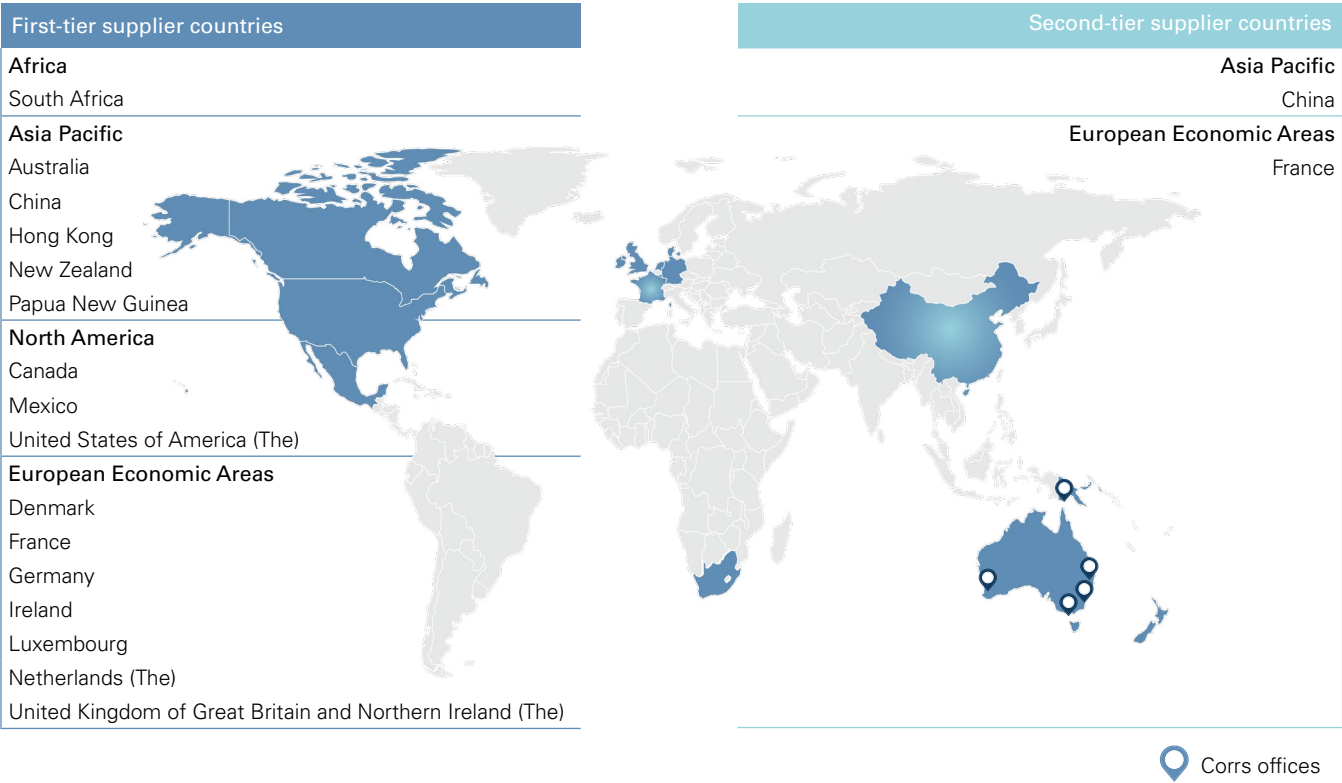
Business travel and accommodation

We commenced procuring materials and products for the fit-out of our new Melbourne premises, scheduled for the following financial year. During the Reporting Period, we procured from about 700 first-tier suppliers (our **First-Tier suppliers**). This figure excludes purchases made on firm issued credit card transactions. A significant proportion of our credit card spend is related to business travel and accommodation, and to a lesser extent purchase of meals.

Around 82% of our First-Tier suppliers are based in Australia. We also have suppliers based in Africa and Asia-Pacific, countries in the European Economic Areas, North America and the United Kingdom of Great Britain and Northern Ireland.

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

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





## Modern slavery risk in our supply chain

### How we assess modern slavery risk in our supply chain

We continue to use a cloud-based supply chain management platform to facilitate and support our tracking and management of supplier data, the evaluation of modern slavery risks and our ongoing supplier engagement. All our first-tier suppliers are added to this platform and given an inherent modern slavery risk rating based on the country and industry of the supplier. Considering this risk rating, we issue supplier assessment questionnaires (SAQs) through this platform to suppliers identified as medium or higher risk, asking these suppliers to provide details relating to the actions they are taking to evaluate, assess and address human rights risks, including modern slavery risks, throughout their operations and supply chains. Through these assessments, we seek to gain greater insight into commodity and labour-related risks, as well as the steps suppliers are taking to mitigate modern slavery risks in their operations and supply chains.

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

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

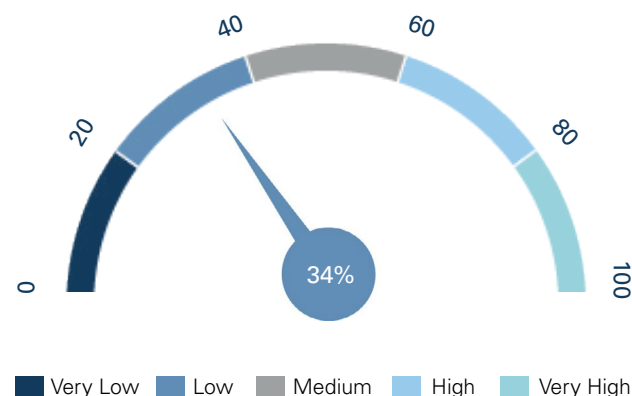
### Key areas of modern slavery risk in our supply chain

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

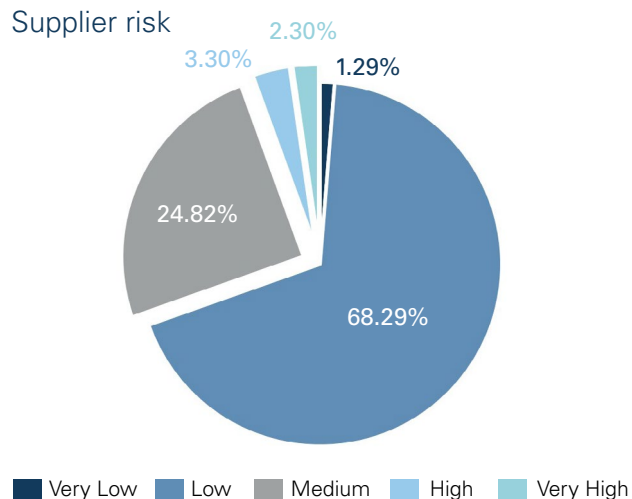
- facilities (including cleaning, car parking, security and other services);
- ICT, including knowledge service providers;
- suppliers operating in Papua New Guinea;
- suppliers using labour outsourcing; and
- travel services (including transport and accommodation).

While our average supplier risk is low, 30% of our about 700 First-Tier suppliers are rated medium risk or above.

Average supplier risk



Supplier risk



There has been an increase in the proportion of our suppliers rated medium risk and above (30% in FY25, compared to 21% in FY24) and our average supplier risk as compared to the previous year (34% in FY25 up from 28% in FY24).

This is partly due to shifts in risk levels for suppliers in sectors with complex supply chains or exposed to higher risk labour practices, and for certain geographies (as identified by Bureau Veritas and incorporated into our supply chain management platform). Some suppliers were reclassified in this Reporting Period as medium risk. Notably, many of these were suppliers across the event hire and catering and commercial cleaning services within the Diversified Support Services classification which increased in risk rating from medium to high risk.

In addition, we had a number of new suppliers with a risk rating of medium or above, again largely across Diversified Support Services, Hotels, Restaurants and Information Technology sectors.

We had six new suppliers rated very high risk, all based in Papua New Guinea spanning sectors including Diversified Support Services, Movies and Entertainment, Security and Alarm Systems, and Construction and Engineering. These suppliers are subject to direct and ongoing engagement.

### Supplier assessment questionnaires

Following analysis of the supplier data for each quarter, suppliers with an inherent risk rating of medium risk or above are sent an SAQ.

Given the Supplier Risk Index updates, we also reviewed suppliers who had previously completed and partially completed SAQs to identify whether there were any significant changes to the risk rating warranting further engagement and a few suppliers were flagged for renewed engagement.

Of the FY25 suppliers who were asked to complete the SAQ during the Reporting Period, 24% of suppliers completed it and a further 5.6% of suppliers have partially completed the SAQ. The remaining suppliers have not responded despite multiple reminders.

Of the suppliers that completed the SAQ during the Reporting Period:



This analysis reinforces the importance of working with our suppliers to build their understanding of modern slavery risks and their capacity to engage in modern slavery risk assessment and minimisation.

Our review of the inherent risk ratings, analysis of SAQ responses and residual risk scores informs our program of supplier engagement and risk minimisation actions, these are discussed in the next section.

The low response rate to our SAQs remains a significant obstacle to fully understanding modern slavery risks in our supply chain. As discussed in the next section, we continue to develop and review strategies to enhance supplier engagement and visibility, focusing on key areas of risk.

# Addressing modern slavery risk

## Addressing risk through continuous improvement

A key focus during the Reporting Period was the implementation of our strengthened Modern Slavery Guidelines and Response and Remedy Framework. Designed to support the practical application of our Modern Slavery Policy and associated internal processes to identify and address modern slavery and to support a victim-centred approach in circumstances of identifying potential modern slavery in our operations or supply chain.

This involved:

- integrating modern slavery risks into our operations-wide Risk Management Framework;
- building internal capacity through the development and roll out of new and updated training;
- communicating our expectations to suppliers regarding response and remedy; and
- clarifying the avenues for reporting modern slavery concerns.

## Integrating modern slavery into our Risk Management Framework

In this Reporting Period, we integrated the risks of modern slavery occurring in our operations and supply chain into our operations-wide Risk Management Framework. This framework is subject to ongoing review and monitoring at the ARMCO and Board levels.

## Building internal capacity

To support the operation of the Modern Slavery Policy and the implementation of the Guidelines and the Response and Remedy Framework, we developed and delivered a comprehensive training program.

### Awareness Training – Human Rights and the Modern Slavery Act

All lawyers starting at Corrs are required to complete the Human Rights and Modern Slavery Act online training module which was updated to include the Modern Slavery Policy, Guidelines, and Response and Remedy Framework. All directors of the partnership and CSS Boards completed the updated training, and it was also made available to personnel who regularly procure goods and services or may be responsible for remediation.

## Targeted Role Based Training

### Modern Slavery Policy and Guidelines

Designed to equip personnel with the tools and knowledge to embed modern slavery due diligence in our procurement and onboarding processes, the Modern Slavery Policy and Guidelines training was attended by personnel across our business services and risk functions. The interactive training covered how to identify, address and report modern slavery risks in our supply chain, and who is responsible for implementing these processes. Through a case study, the training demonstrated practical strategies for navigating procurement challenges, including how to effectively influence and support suppliers during the onboarding and contracting phase to achieve compliance with our Minimum Standards. In particular, we focussed on the amendments to our Contracts Policy indicating that suppliers are required to confirm they have policies and processes in place to meet our Minimum Standards rather than implement our policies, and how this can be achieved in practice.

### Modern Slavery Response and Remedy Framework

Ensuring all personnel, particularly those likely to receive or respond to modern slavery concerns, have practical guidance and skills for addressing grievances and incidents within our operations or supply chain in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs) is critically important. Our new Modern Slavery Response and Remedy Framework training is grounded in a victim-centred approach, focused on principles of transparency, safeguarding, confidentiality, remediation and prevention. Senior managers from business services and risk functions were trained on their roles and responsibilities in responding to modern slavery concerns, while case studies enabled participants to apply the Response and Remedy Framework to real-world scenarios.

### Modern Slavery training for Whistleblower Contact Officer and Workplace Contact Officers

As concerns of modern slavery can be raised under our Whistleblower Policy and Respect in our Workplace Policy, we provided training to our Whistleblower Contact Officers and our Workplace Contact Officers. Through this training, our Whistleblower and Workplace Contact Officers were made aware of how to identify modern slavery risks, how to respond using a victim-centred approach and how and when to escalate concerns in accordance with our policies.

## Communicating with suppliers about their role in remediation

We engaged with our suppliers to communicate our expectations of suppliers and to build understanding of their role in responding to and remediating modern slavery in line with our policies and Guidelines. We did this through our due diligence processes and our supplier training. This included updating our supplier email templates to address our expectations in respect of the provision of timely information, taking corrective actions when necessary and supporting affected workers.

## Clarifying reporting avenues

To ensure our personnel and people from outside of Corrs can easily report concerns about modern slavery in our operations or supply chain, we amended our Modern Slavery Policy and Guidelines to clarify the available avenues for reporting. We reviewed our Whistleblower Policy to confirm that reports related to modern slavery can also be raised under this policy. We also updated our website to provide a contact point for any external parties seeking to report a concern about modern slavery.

## Addressing modern slavery risk in our supply chain

### Supplier training and education

We invited all our suppliers to attend our annual online modern slavery supplier training in an ongoing effort to build capacity, support continuous improvement and enhance supplier engagement. The training addressed what modern slavery is, the risks of modern slavery in supply chains and red flags for identifying it, the regulatory reporting requirements and meeting Corrs' Minimum Standards. This year we also addressed the anticipated regulatory changes and likely impacts for businesses and, as mentioned above, our remediation expectations.

The webinar was delivered by two legal professionals from our Responsible Business and ESG practice group and focused on answering common queries we receive from our suppliers relating to modern slavery.

As in previous reporting periods, we will continue to provide updates to our suppliers in respect of any changes to the legislative framework or information provided by the Attorney General's Department, including any reforms to the Modern Slavery Act that follow the consultation being undertaken by the Attorney General's Department in the second half of 2025.

## Addressing key areas of risks

In this Reporting Period, we have continued to focus on conducting a more detailed analysis of the modern slavery risks, and the opportunities to engage with suppliers to minimise those risks, arising in relation to ICT suppliers and suppliers operating in Papua New Guinea. We also took action to review and address the modern slavery risks in our human resources and employment services providers.

In the next reporting period, we will broaden our review of high risks areas to include a focus on business travel and accommodation.

### Information and communications technology suppliers

We have continued to focus on modern slavery risk in the ICT industry. This involved our continuing efforts to integrate modern slavery into our third-party risk assessment processes and to review our ICT supply contracts.

### Enhancing our third-party risk assessment processes

It has been our experience that large ICT suppliers are more likely to actively engage and provide more useful information when we engage on modern slavery risks and due diligence in the early stages of the procurement process, from initial scoping and assessment.

Corrs' third-party risk assessment process evaluates potential suppliers against ten key security metrics at a very early stage of the procurement process. Our incorporation of modern slavery risk into this assessment has enabled us to compare and consider modern slavery risks and controls as part of our early consideration of the suitability of potential suppliers. It also enables us to leverage the contracting and procurement stages to encourage suppliers' completion of the SAQ.

### Review of our ICT supply chain

We continued our review of ICT suppliers and processes by focusing on key contract renewals undertaken during this Reporting Period.

We identified key contracts that had been renewed or were due for renewal to determine whether modern slavery due diligence was being carried out at the time of contract renewals and the actions that were taken as a result. We found that while many contract renewals included refreshed modern slavery due diligence, some had not. This engagement between our Business and Human Rights Consultant and our ICT personnel provided an opportunity to address misunderstandings and common challenges in the implementation of our risk assessment and minimisation processes.

We used the review process as an opportunity to build capacity among procurement personnel around our modern slavery due diligence processes, ensure risk due diligence is carried out at the contract renewal stage and inform the content of our internal training.

In the next reporting period, we will prioritise expanding this review to our top ten ICT suppliers with the largest spend and highest risk, and our ICT suppliers in Papua New Guinea. This approach ensures we are focusing on suppliers where we have the greatest commercial influence, which can strengthen our ability to drive compliance and improved practices.

### Case Study: Modern slavery risk assessment in contract renewal

When negotiating a contract renewal with a key supplier for a major cloud-based infrastructure project, we identified that they had still not completed the SAQ that had been issued as part of a contract process in a previous reporting period. Despite repeated requests, the supplier refused to complete the SAQ, clarify their use of sub-contractors, or provide adequate information about their labour rights policies. Negotiations were further complicated by the supplier's offshore legal team and reluctance to agree to our reasonable assistance clause.

To address these concerns, we escalated the issue to the supplier's ESG lead and arranged a meeting with a member of our Responsible Business and ESG team. We explained our approach to managing modern slavery risks and emphasised our commitment to working collaboratively to address risks. During the discussion, we were able to obtain more detailed information about the supplier's commitment and approach to modern slavery and some of the areas of potential risk.

Following this engagement, the supplier completed the SAQ. While the supplier did not fully address all our follow-up questions about their labour rights policies or the location of their sub-contractors, this experience highlighted the value of incorporating the risk assessment into early contracting processes and the need for persistence and supporting suppliers to understand and work towards meeting our Minimum Standards. The progress also demonstrated the benefits of direct engagement between senior levels of management across Risk/ ESG/Human Rights/ Responsible Business functions in addition to procurement and/or account managers directly responsible for the contracting process.

### Suppliers operating in Papua New Guinea

We have continued to engage with suppliers in Papua New Guinea. Through discussions with national administration personnel and Papua New Guinea-based practitioners, we found that engagement is more effective when initiated by someone familiar with the supplier, and who could provide support in completing the SAQ. We identified six high-risk Papua New Guinea suppliers for targeted engagement and developed a tailored SAQ for these suppliers. As a result of these efforts, our cleaning provider in Papua New Guinea completed the SAQ and we remain in dialogue with that supplier around its policies and practices. A number of their employees also attended our annual supplier training.

### Human resources and employment services providers

We acknowledge that we have lower visibility over potential modern slavery risks when we recruit personnel through third party providers. To address this, we reviewed our arrangements with Human Resources and Employment Services providers to understand:

- to what extent they are used to recruit staff from overseas, including non-professional staff in low-skilled, temporary, casual workers, and paralegals, including migration services.
- whether they are provided with our Minimum Standards and if so, are they able to meet them.

We have amended our standard Terms of Business to ensure alignment with our modern slavery commitments. These updated Terms are now sent to all our recruitment providers alongside our Minimum Standards. The Terms now require all recruitment providers to respond to a set of standard questions in relation to modern slavery and confirm they can meet them. Many providers have confirmed that they have processes and systems in place that enable them to meet our Minimum Standards. This work is ongoing, and to date, we have not received any responses that have required further investigation.

Additionally, we renewed our contracts with online recruitment providers, ensuring that these organisations have also appropriate processes and systems in place to address modern slavery risk.



# Collaboration and building understanding

Our strategy for addressing modern slavery risks focuses on strengthening both internal and community efforts around prevention and mitigation, as well as upholding broader human rights responsibilities. During the Reporting Period, Corrs advanced its collaboration with industry and civil society.

## Collaboration

Corrs actively contributes to the anti-modern slavery community and seeks to improve our stakeholder engagement. During the Reporting Period we undertook the following actions.

- Continued our membership of the United Nations Global Compact Network Australia (**UNGCNA**) Modern Slavery Community of Practice (**MSCoP**). The MSCoP is a community of industry leaders addressing supply chain and modern slavery risk management and provides an opportunity to share and develop best practice. Aligned with the purpose of the MSCoP, we support our internal SWG as well as other members in responding to increased regulatory movements on modern slavery and human rights due diligence.
- One of Corrs' Partners is a member of the UNGCNA Technical Advisory Group on Business and Human Rights, providing input to the programming of events, advocacy and education activities of the business and human rights stream of the UNGCNAs work engaging on issues that are a barrier for responsible business in Australia.
- Continued our commitment to actively participate in the Business and Human Rights Lawyers Association (**BHRLA**) to facilitate capacity building, thought leadership and industry collaboration for law firms advising on business and human rights issues. Attended BHRLA sessions in Geneva Switzerland to discuss evolving human rights and environment laws and the evolving professional responsibility of lawyers in the context of business respect for human rights and in particular forced labour and modern slavery.
- Contributed a submission to the Australian Anti-Slavery Commissioner in response to the invitation for input on the Anti-Slavery Commissioner's Strategic Plan 2025-2028.
- Attended the United Nations Forum on Business Human Rights and the UN Business and Human Rights Regional Forum - Australia and New Zealand, with Corrs representatives moderating two modern slavery related panels.

- Participation in a Red Cross workshop on human rights risk for businesses operating in conflict zones.
- Client boardroom lunches and roundtables, including briefings on modern slavery reporting developments and associated legal risks and sustainability collaborations, providing a forum for clients to share experiences.

In the next reporting period, we will work with the Office of the Australian Anti-Slavery Commissioner on a sustainability collaboration project.

## Building understanding and thought leadership

During the Reporting Period, we delivered, participated in, or facilitated a range of information or educational initiatives in respect of human rights impacts of business operations, including risks of modern slavery.

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

### Essential ESG podcast



Unpacking the EU's Corporate Sustainability Due Diligence Directive

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

### Insight articles



Australia's evolving ESG regulatory landscape: managing the legal risks



Australian Government responds to statutory review of Modern Slavery Act



ESG regulatory trends: in-house counsel front and centre as ESG regulation proliferates



How Europe's human rights and environmental due diligence directive will impact Australian businesses

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

## Effectiveness of our program of work

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

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

- internal capacity building;
- supplier questionnaires;
- supplier training;
- supplier onboarding and contracting; and
- awareness raising.

We also commenced developing an effectiveness framework to guide and consolidate how we measure the effectiveness of our actions over time. We aim to finalise this framework in the next reporting period.

### Internal capacity building

We undertook several surveys to assess the effectiveness of our internal capacity building initiatives. The surveys used the KAP (Knowledge, Attitudes and Practices) survey model, which evaluates what participants know, believe and do in relation to a specific topic. These surveys included:

- a post training survey of the Human Rights and the Modern Slavery Act online training module;
- pre and post surveys of the Modern Slavery Policy and Guidelines training; and
- pre and post surveys of the Modern Slavery Response and Remediation training.

| Survey                                                                | Participation                                                                                  | Key findings                                                                                                                                                                                                                                                                                                         | Feedback/Next steps                                                                                                                                                                                                                                                                                                                              |
|-----------------------------------------------------------------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Human Rights and the Modern Slavery Act online training module</b> | 171 completed module and were invited to participate in the survey<br>42% survey response rate | <ul style="list-style-type: none"> <li>• Increased awareness, confidence, and behavioural change since FY21.</li> <li>• Improved internal recognition and personal accountability.</li> <li>• External risk identification (client/supplier engagement) remains an area for growth.</li> </ul>                       | <ul style="list-style-type: none"> <li>• Continue to distribute survey 3 months post-training for better long-term impact assessment.</li> <li>• Integrate training into induction for relevant business services staff, especially procurement roles.</li> <li>• Continued focus on external risk identification in future training.</li> </ul> |
| Modern Slavery Policy and Guidelines training                         | 61 invited, 41 attended (73.7%)<br>40% survey response rate                                    | <ul style="list-style-type: none"> <li>• Improved general awareness of modern slavery.</li> <li>• Clarified firm's obligations and due diligence processes.</li> <li>• Increased confidence among procurement staff.</li> <li>• Some misconceptions remain around definitions and indicators.</li> </ul>             | <ul style="list-style-type: none"> <li>• Refine training content to include more realistic scenarios.</li> <li>• Reduce overlap with online module.</li> <li>• Offer more frequent, smaller sessions to deepen engagement and clarify complex concepts.</li> </ul>                                                                               |
| Modern Slavery Response and Remediation training                      | 16 invited<br>13 attended (81.25%)<br>92% survey response rate                                 | <ul style="list-style-type: none"> <li>• Enhanced skills in addressing modern slavery concerns.</li> <li>• Increased confidence and understanding of reporting and safeguarding.</li> <li>• Stronger recognition of importance of response.</li> <li>• Some confusion about accountability for oversight.</li> </ul> | <ul style="list-style-type: none"> <li>• Continue annual delivery of training sessions.</li> <li>• Monitor implementation of policies and frameworks.</li> <li>• Provide quick reference guide.</li> <li>• Incorporate more realistic examples.</li> </ul>                                                                                       |

## Supplier questionnaires

In the last reporting period, we identified that the SAQ was not providing the level of clarity we needed – particularly in relation to questions around procuring goods, services and raw materials. Specifically, there was no provision for suppliers to indicate the countries they procured from or outsourced to. As a result, responses were often grouped together, making it difficult to interpret the data. During the Reporting Period, we revised the SAQ to include targeted questions that address these gaps. Although limited responses have been received to date, we expect that over time it will provide more accurate insights into the geographic sourcing of goods and services. We will continue to monitor the impact of this change over the next reporting periods.

Despite ongoing efforts, obtaining supplier responses to our SAQs and requests for information continues to be challenging. While we have fine-tuned our communications, increased direct communication and focussed on direct engagement with some key suppliers at contract renewal stages (see the case study on page 15), response levels continue to be lower than we would like, limiting the effectiveness of the SAQ process in informing our supply chain risk assessments.

Throughout the reporting period, we explored a number of alternative technology-based tools to assist in the inherent risk assessment process. As these tools develop in sophistication with enhanced AI processes and accuracy, we will continue to monitor the opportunities available to us.

## Supplier training

This year we recorded an increase in supplier attendance, a number of requests for the recorded session in advance, and feedback from some suppliers that the training was useful. We also directly encouraged our Papua New Guinea suppliers to attend this webinar to understand the purpose of the SAQ, which led to participants from our Papua New Guinea cleaning supplier attending. Despite the engagement in training there has not been a noticeable increase in the number of SAQ responses.

## Supplier onboarding and contracting

Our efforts to streamline contracting policies and supplier onboarding processes and increase understanding and capacity have been extensive. While it is difficult to measure the effectiveness of these actions, anecdotal evidence indicates that personnel are increasingly integrating modern slavery due diligence early in the contractual process and we are generally receiving more inquiries and questions from procurement and other personnel.

## Awareness raising

Throughout the year we continue to engage internally and externally to raise awareness and understanding of modern slavery, its risks and manifestations. Readership of our communications and requests for presentations and enhanced learning opportunities among the broader Corrs community, and our suppliers, indicates a willingness to learn and engage on issues related to modern slavery and the associated risks.

For example, the insights listed on page 16 were viewed over 5,700 times in total.

## Consultation

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

The SWG oversees Corrs' actions across ESG and business and human rights, including modern slavery. The SWG has oversight of policies and processes addressing ESG and business and human rights risks, including modern slavery across our operations and supply chain, as described throughout this Statement. The SWG comprises members of the Corrs Chambers Westgarth partnership, and senior managers of Corrs Support Services Pty Ltd.

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

## Approval

Corrs makes this Statement in accordance with section 14 of the Modern Slavery Act 2018 (Cth) and constitutes Corrs' Modern Slavery Statement for the financial year ended 30 June 2025.

This Statement has been approved by the Board of Corrs Chambers Westgarth on Wednesday 3 December 2025 and the Board of Corrs Support Services Pty Ltd on Thursday 11 December 2025.



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

CORRS  
CHAMBERS  
WESTGARTH

Sydney

Melbourne

Brisbane

Perth

Port Moresby