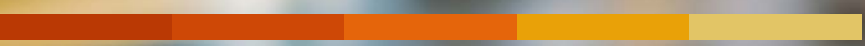


Wherever our clients need us, that's where we are.

Modern Slavery Statement

Sparke Helmore

1 July 2022 – 30 June 2023



This Modern Slavery Statement (**Statement**) is made on behalf of Sparke Helmore Lawyers (ABN 78 848 387 938) and its controlled entities, including Spamil Pty Limited (as trustee for the Spamil Discretionary Trust) (ABN 59 828 738 349) (together referred to as “Sparke Helmore”, “we”, “us” and “our”).

Introduction

Sparke Helmore recognises that modern slavery includes trafficking in persons, slavery, slavery-like practices (including forced labour, forced marriage and debt bondage) and the worst forms of child labour, and that modern slavery can occur in any country, sector or industry. Sparke Helmore opposes modern slavery in all its forms and does not tolerate any forms of slavery or human trafficking in our business or our supply chains.

Our strategies and processes to address modern slavery risks in our supply chains have been developed and reviewed by our senior operational team leaders, including Office Services, People and Culture, Information Technology and Internal Legal and Risk to ensure that we take a coordinated approach across our business. These processes include a commitment to ongoing monitoring and continuous improvement.

Reporting Period 2022/2023

This is the third Modern Slavery Statement (**Statement**) for Sparke Helmore under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). It covers the reporting period 1 July 2022 to 30 June 2023 and was approved by the Sparke Helmore Board on 29 February 2024.

Over the course of all reporting periods, Sparke Helmore experienced no actual or suspected cases of modern slavery in our operations or supply chains.

Purpose

The purpose of this Statement is to outline Sparke Helmore’s ongoing commitment to identifying and understanding the risks of modern slavery and human trafficking in our operations and supply chain. The Statement also reports on the steps we have taken to implement robust frameworks and processes to minimise these risks.

Through the measures we take we hope to continue to contribute to a global reduction in modern slavery and human trafficking.

About Sparke Helmore

Sparke Helmore is an Australian partnership and law firm delivering legal services. Sparke Helmore operates in Australia across nine offices and all states and territories other than Tasmania.

Spamil Pty Ltd is the trustee of the Spamil Discretionary Trust, which provides administrative and support services to the other Sparke Helmore businesses. Further information about Sparke Helmore can be found on our website:

www.sparke.com.au



The Chair and the National Managing Partner of Sparke Helmore Lawyers are also the directors of and control Spamil Pty Limited. The operations of all Sparke Helmore entities are delivered and overseen by the same people. All Sparke Helmore entities have been consulted in the preparation of, and have endorsed, this Statement.

Sparke Helmore’s values

Sparke Helmore continues to be committed to the highest standards of professionalism, ethical behaviour and integrity in everything we do. We have a zero-tolerance approach to all human rights abuses.

Sparke Helmore is a values-driven business that strives to:

	put our clients at the heart of everything we do
	always be authentic, ethical and behave with integrity and respect
	enable people to be their best
	be open to change, adapting to challenges and uncertainty
	work collaboratively towards achieving our goals, and
	lead by example.

Sparke Helmore's operations and supply chains

Sparke Helmore is a law practice and professional services business that predominantly employs professionally qualified and highly skilled people. We comply, to the highest standards, with all employment and workplace-related laws in each of the jurisdictions we operate in and from.

As a professional services business our supply chain primarily consists of goods and services we procure to assist our people to deliver our services.



We only use reputable suppliers, most of which are based in Australia and are subject to Australian law. Our international suppliers tend to be large, leading global brands that primarily support Sparke Helmore with knowledge and subscription services, insurance, and information communications technology, and operate in jurisdictions that have at least equivalent anti-slavery and human trafficking laws to Australia.

Training, awareness and ongoing review

During the reporting period, we provided education sessions to build awareness of what modern slavery looks like, associated risks and global implications for human rights.

Lawyers from our Corporate Advisory and Mergers & Acquisitions team have established a Modern Slavery training presentation for existing and new clients who are interested to learn more about how they can be aware of and combat Modern Slavery in their businesses and supply chains. The training has been well received by clients and has assisted in their understanding of how to identify modern slavery within their supply chains.

Sparke Helmore is familiar with the Federal Government's statutory review of the Modern Slavery Act. Should any of the recommendations listed in the report be adopted, Sparke Helmore will take additional steps, including further due diligence, to continue to address the ongoing fundamental human rights challenges associated with modern slavery.

Sparke Helmore ethical framework

Sparke Helmore has a long and proud commitment to the highest standards of ethics and integrity in all that we do, and our approach to modern slavery risks is consistent with that approach. We recognise that our reputation rests on how we conduct ourselves individually and collectively as a business. We have a suite of policies that reinforce how we do business in the right way, including:

- **Code of conduct** — sets out how we expect our people will conduct themselves and live our values – individually, in working with colleagues and clients, and when engaging with the broader community.
- **Fraud and Corruption Control Framework** — sets out how we do not tolerate acts of fraud, bribery or corruption of any kind, and the expectations we have regarding the acts of our people, and the agents, consultants, and contractors with whom we work.
- **Work Health and Safety Policy** — demonstrates our commitment to provide a safe environment for workers and visitors, our **Workplace Gender Equality Policy**, which seeks to advance and promote gender equality in all the firm's activities and embed it in our culture, and our **Diversity & Inclusion Strategy** which encourages all our people to value diversity and respect each person's individuality and other aspects of identity such as gender identity, religion, racial background, disability, sexual orientation and ethnicity.
- **Corporate Social Responsibility Policy** — sets out how we seek to ensure our business is sustainable over time and that we have a positive impact on our people, our clients, and the community.
- **Environmental Policy** — describes our commitment to the principles of sustainable development and our intention to promote the principles of sustainable development and best practice environmental management.
- **Conflicts Policy** and **Personal Interests and Dealings in Securities Policy** — ensure our business adheres to the highest standards when managing conflicts of interest: between clients; with our business; and where our people may have a personal interest.
- **Performance Management and Disciplinary Policy** — deals with, amongst other things, any behaviour amounting to misconduct by our people.



The Modern Slavery risks in Sparke Helmore's operations and supply chains

We have continued to assess that our supply chains and operations are very low risk of involving modern slavery, with very few areas having the potential for modern slavery activities, including through our direct suppliers.

We have acknowledged that continual vigilance and continuous improvement of our own supply chain risk identification and assessment processes remains pivotal in combatting modern slavery.

Where there is the potential for modern slavery activities these are generally down the supply chain involving secondary or tertiary suppliers to our primary suppliers, which tend to be large, multinational companies with substantial business and ethical conduct programmes of their own, and which are subject to strict anti-slavery laws in the various jurisdictions in which they operate. We tend to not engage smaller, local companies within emerging economies where laws tend to be weaker, and the highest risk of modern slavery practices exist.

Actions taken to assess and address modern slavery risks

During our second reporting period, we continued to review our supply chains, our policies and our procurement practices. Consistent with previous years, no specific risks were identified as requiring mitigation or remediation.

In our next reporting period, we intend to review our due diligence and supplier assessment processes to ensure that we continue to identify risks associated with third party suppliers. If risks are identified, we will develop strategies to mitigate or remediate those risks, including where necessary to terminate arrangements with non-compliant suppliers.

Assessing the effectiveness of action taken

We continue to review our processes to ensure that we are adequately identifying and addressing operating and supply chain risks, and we continue to monitor broader developments relating to modern slavery risks.

We remain confident that our processes are robust and that there is no modern slavery present in our supply chains.

We will review our modern slavery awareness training for our procurement people to ensure it is appropriate, including seeking feedback on our processes and modern slavery training to assist in assessing their effectiveness and areas for improvement.

While to date no modern slavery risks have been identified, should any be identified in the future these are to be escalated as appropriate to our Head of Internal Legal and Risk and our Chief Operating Officer. These two individuals will respond to the identified risk by developing a mitigation and/or management plan considering the specific context and circumstances and, where appropriate, reporting through to the National Managing Partner, Audit and Risk Committee, and the Board. We are pleased to note that there have been no identified risks since our last reporting period.

Consultation

This Statement has been prepared following consultation with Sparke Helmore's operation leadership team, including Chief Operating Officer, IT Director, Director of Office Services and Premises, Chief Financial Officer, and Head of Internal Legal and Risk, who together oversee operation and procurement activity across all Sparke Helmore entities.



Future actions

Over the next reporting period, we will be taking steps to improve our supply chain risk identification and assessment processes, including:

- ✓ implementing as a standing item reporting on Modern Slavery risks for the quarterly meetings of our Audit and Risk Committee
- ✓ assessing the merit of establishing an ongoing operational working group to consider and assess the modern slavery risks associated with our supply chains
- ✓ identifying training options to improve and embed understanding within our business about what modern slavery entails, its forms and how to flag risks
- ✓ continuing to ask suppliers about potential modern slavery risks in their supply chains, and seeking to include contractual obligations suppliers commit to respecting and supporting international human rights and comply with obligations regarding modern slavery
- ✓ reviewing recently published Modern Slavery Statements of our Australian based suppliers and equivalent statements of our overseas suppliers
- ✓ updating training programs for our people engaged in procurement to increase awareness of modern slavery risks in our supply chains, and
- ✓ maintaining a register of any modern slavery risks identified within our supply chain.

Board approval

The Boards of Sparke Helmore Lawyers, and Spamil Pty Limited approved this statement on 29 February 2024.



Signed by Roland Hassall

Chair, Sparke Helmore Lawyers

