Lawyers | McCullough Robertson

Modern slavery statement

For reporting period 1 July 2024 to 30 June 2025

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Modern slavery statement

McCullough Robertson does not tolerate modern slavery within its business and supply chains. We are committed to behaving in an ethical manner which upholds integrity and transparency in all our business dealings. In achieving this, we make use of effective and reasonable systems and controls to reduce the risks of modern slavery and to ensure that modern slavery is not taking place within our business or supply networks.

Our modern slavery statement sets out the steps McCullough Robertson takes to prevent, identify and respond to slavery and human trafficking. This statement details the risks of modern slavery in our supply networks and business operations and the actions we have taken to assess and address such risks within our business operations and supply networks when providing legal services during this FY25 Reporting Period (including but not limited to supplier due diligence and employee training). Further, this statement reviews the mechanisms we have in place to assess the effectiveness of our risk management processes and our future actions for the next reporting period to address modern slavery.

Reporting entity

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (the Act) by J.R Arklay & Others ABN 42 721 345 951, trading as McCullough Robertson. This statement relates to the reporting period 1 July 2024 to 30 June 2025 (FY25 Reporting Period).

About our business

Lawyers McCullough Robertson

McCullough Robertson

McCullough Robertson is a leading independent Australian law firm, predominantly servicing the eastern States and Territories of Australia. We are made up of over 431 employees, including 61 partners and 176 support staff.

As a leading legal services organisation, McCullough Robertson recognises that the social and environmental performance of our business, our customers and our suppliers plays a significant role in our long-term success. We are committed to understanding the social and environmental consequences of our business.

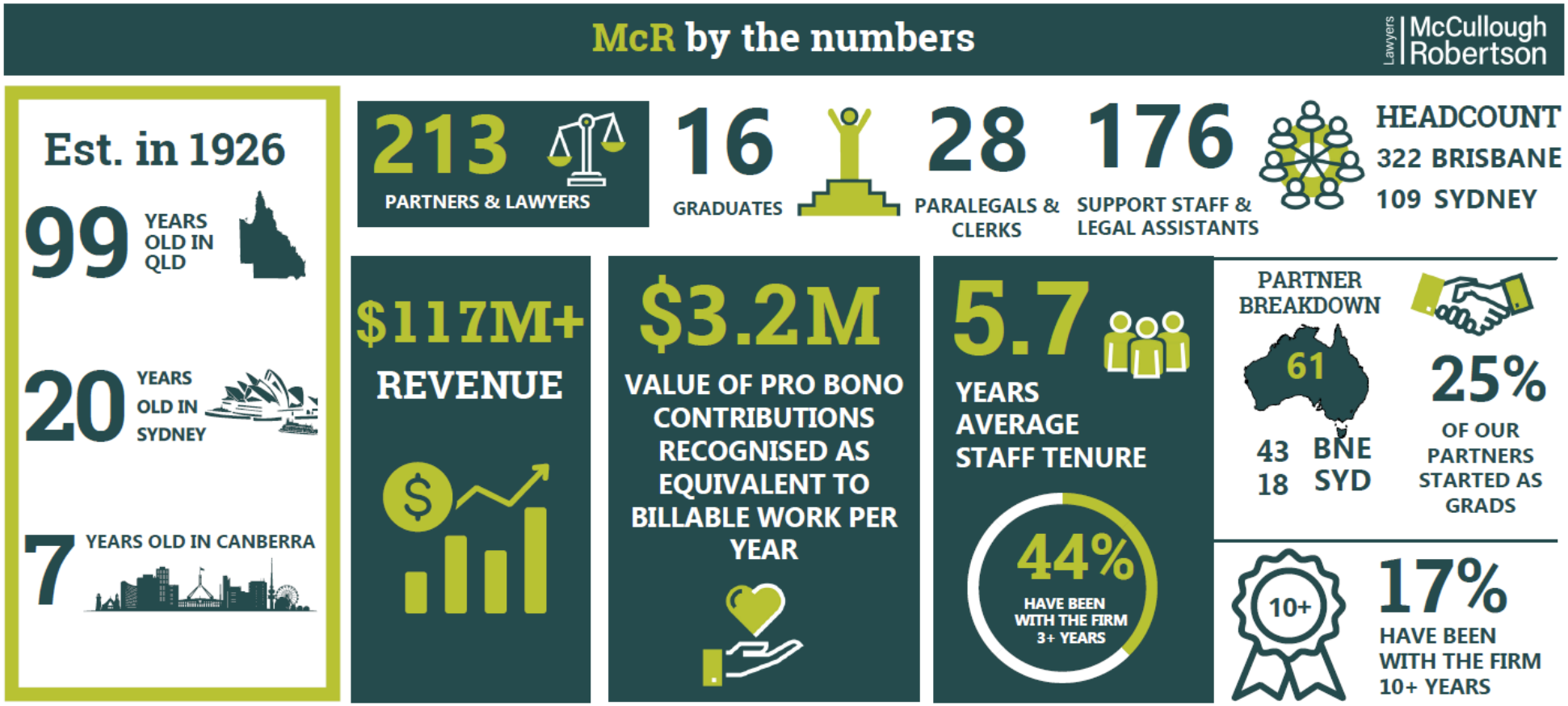
Our structure

McCullough Robertson adopts a corporate leadership model with senior management responsibility resting with the Executive Committee, Joint Managing Partners, Chief Operating Officer and Chief People Officer.

The Executive Committee is responsible for setting the firm's strategic direction and reviewing overall performance.

The Joint Managing Partners, Chief Operating Officer and Chief People Officer are responsible for day to day management of the firm, implementing the firm's strategic plan and managing financial performance to budget.

Our business operations for the FY25 reporting period



Our business operations

The activities undertaken by McCullough Robertson are fundamentally the provision of legal and other professional services to clients overwhelmingly in Australia, and to a limited extent globally. Our services are provided by members of the partnership as well as employed lawyers, technology experts and support staff. Our client base is primarily a mixture of public and private sector entities. Our private sector clients range from major Australian and foreign owned corporations to medium size businesses with purely local interests and a limited number of high-net-worth individuals.

Our public sector clients include federal and state government departments, local government, statutory authorities and government business enterprises.

We also run a Community Partnership program (CPP) which is the framework through which we work to facilitate positive social change in identified areas. Our CPP incorporates pro bono and volunteer work, sponsorship, funding and donations. It has four priority areas being sustainability, access to justice and community arts, health and mental health, and inclusion and diversity.

Our CPP provides opportunities for our people to volunteer and fundraise for the charities we have a connection with. We offer these opportunities through LawRight, Bardon Neighbourhood clinic and Kingsford Legal Centre amongst others.

Our supply networks

McCullough Robertson's supply networks include a range of vendors of goods and services. The goods and services include technology and hardware, facilities and facilities management, utilities, insurance and financial services, office furniture, consumables and fit out, knowledge and subscription services, document storage and archiving, hospitality and catering, mobility and travel, marketing and merchandise, cleaning services, office suppliers of stationery, professional services including legal services, consulting and software.

Most goods and services within our supply networks are from Australia and provided by Australian local suppliers which McCullough Robertson has long-term, stable relationships with.

Risks of modern slavery in our business operations and supply networks

We have assessed the risks contributing to (Tier Two) and directly linked to (Tier One) modern slavery practices within our business in the FY25 Reporting Period. The levels of risk and types of suppliers we identified in the FY24 Reporting Period remain in our business operations in the FY25 Reporting Period.

Whilst we are not in a high-risk sector, many of the risks of modern slavery in our business operations are with Tier Two suppliers and there are no risks directly linked to our business operations in Tier One. We accept and recognise that there is likely to be some risk of modern slavery in extended supply networks. We have identified the following areas of most risk:

Mindful of the greater risks, we look more closely into the upstream connections of our suppliers in these areas, specifically those in high risk geographical locations, and those with products or services with a heightened level of risk.

McCullough Robertson Lawyers

Actions taken to assess and address modern slavery risks

Organisational commitment

Our Statement of Business Ethics is a commitment to doing business in an ethical, equitable and accountable way consistent with all Australian and international laws, regulations, codes and standards relevant to our work. We engage with suppliers who share and have adopted similar values.

People, inclusion, health and safety

We support responsible labour practices that contribute to the development of fair, safe, supportive and inclusive workplaces. Human rights (such as those set out in the Universal Declaration of Human Rights), must be protected, and we are dedicated to the active identification and management of human rights issues.

We believe that everyone benefits from the creation of inclusive and diverse workplaces, free from bullying, harassment or any discrimination prohibited by law – including discrimination on the basis of gender identity, age, religion, disability, ethnicity, cultural affiliation or sexual orientation.

Our employment practices are governed by the Fair Work Act 2009 (Cth) and supported by internal policies to ensure compliance with Australian workplace standards. All people are entitled to fair and appropriate pay, benefits and working conditions. We are committed to encouraging gender equality across our supply networks. We and our business partners must comply with Workplace Gender Equality legislation and have appropriate and supportive processes and policies in place.

In no circumstances will we engage in or facilitate any form of child labour or forced or involuntary labour. We strictly comply with our obligations under Australian Modern Slavery legislation.

We are also committed to maintaining healthy and safe work environments in all our places of work and complying with all relevant health and safety laws.

Procurement and supplier due diligence

Before entering into or renewing a supplier arrangement, the following searches must be undertaken and the risk of doing business with that supplier assessed.

Company or other organisational searches (wherever applicable and available)

Credit search

Dow Jones risk searches on the name of the supplier business and known associated entities and individuals (including any individual partners or officeholders), which include comprehensive searches of various risk categories including international trade controls, sanctions and adverse media

A supplier must not be engaged where the results of the searches demonstrate that they pose an unacceptable level of risk (whether to us, our clients, or the communities in which we live and work, or any risk of modern slavery practices). During the FY25 Reporting Period, we have not identified any new suppliers with an unacceptable level of risk.

Supplier due diligence – assessment, identification and management of risks

Before entering into or renewing a supplier arrangement, we must be reasonably satisfied that the supplier conducts its business in a manner consistent with our Statement of Business Ethics (also known as our Supplier Code of Conduct) and that it has appropriate policies, procedures and controls in place taking into account the:

- size of the supplier's business (in terms of number of employees, and annual turnover)
- supplier's areas of operation (both geographically and in terms of relevant industries)
- nature and value of the good or services to be supplied (with reference to their level of risk in exposure to modern slavery practices)
- term of the contract and key provisions within the contract
- extent to which there have been any key changes to Australian and international laws, regulations, codes and standards relevant to our work, or to the supplier's business operations

(together, **Appropriate Factors**)

A supplier must not be engaged where the results of the searches demonstrate that they pose an unacceptable level of risk (whether to us, our clients, or the communities in which we live and work). In the FY25 Reporting Period, we did not identify any existing suppliers (with their supplier arrangement being renewed) or new suppliers who posed an unacceptable level of risk. We will continue to assess and use the above Appropriate Factors in the FY26 Reporting Period to ensure no supplier arrangements are renewed or entered which expose us to an unacceptable level of risk.

Supplier due diligence – assessment, identification and management of risks

To determine whether a supplier conducts its business in a manner consistent with our Statement of Business Ethics and applicable workplace and safety laws, including the Work Health and Safety Act 2011 (Cth), we use an ethical supply network questionnaire. Included in our ethical supply network questionnaire is a range of questions ensuring suppliers comply with non-engagement of child labour, forced labour, bribery, slavery, servitude, debt bondage or deceptive recruiting for labour, non-discrimination, ensuring they adhere with minimum wage requirements as per their local law and employees work reasonable hours.

By implementing the ethical supply network questionnaires in the FY25 Reporting Period, we were able to further engage with our suppliers and vendors, gaining a better understanding of their practices and challenges, which ultimately assisted in understanding any modern slavery risks which may be present. Our supply network questionnaire also assists in increasing our due diligence conducted on our suppliers.

We are committed to ensuring we encourage gender equality across our supply networks and all procurement must comply with the requirements of our Procurement Statement - inclusion and diversity.

A proposed supplier must not be engaged where it is clear that the supplier does not conduct their business in accordance with either our Statement of Business Ethics or our Procurement Statement – inclusion and diversity.

McCullough Robertson also assesses modern slavery risks through regular compliance audits of existing suppliers to assess risks and take action in addressing the impact of these risks, for example, through terminating contracts with existing suppliers and further assessing existing suppliers within similar industries, geographical locations and sectors. As noted above, in the FY25 Reporting Period, compliance audits found no risks or red flags resulting in no further action being required.

These steps in assessing risk assist McCullough Robertson in tracking and measuring supplier and vendor compliance for future modern slavery risk management. In addition to the above, we look to also introduce in the FY26 Reporting Period, a triaging system for suppliers and their risks and reports. This triaging system will focus on categorising suppliers as either key supplier and secondary suppliers, with key suppliers being the suppliers which require an increased level of focus when it comes to audits, supplier questionnaires and engagement. The

suppliers will be assessed and triaged based upon factors including their geographic location and ranking Corruption Perceptions Index, product type and expenditure.

Supplier due diligence – contract terms and remediation

Where appropriate, and taking into account the Appropriate Factors, we ensure that the supplier arrangement includes agreement by the supplier to comply with any:

- **policies and procedures** (of ours and our clients) that we reasonably believe are relevant to the supplier's business, as notified by us from time to time;
- **compliance audit requests by us** (for information or other assistance), to allow us to confirm their compliance with our Statement of Business Ethics;
- **remediation plans requested by us**, to address any actual or potential non-compliances with our Statement of Business Ethics; and
- **agreement** to comply with modern slavery requirements.

Remediation

In addition to the remediation plan request, we also promote a culture of ethical compliance within McCullough Robertson by encouraging the raising of concerns and reporting through:

- internal grievance resolution procedures;
- our Whistleblowing policy;
- our Issues Management policy; and
- anonymous feedback through company surveys, further remediated by the partnership of McCullough Robertson.

In the FY26 Reporting Period, we aim to introduce further modern slavery contract terms within our supplier agreements and vendor arrangements to ensure compliance with modern slavery requirements not only within their business, but also within their broader supply networks.

Supplier compliance and due diligence

For existing supplier arrangements, we must ensure that we conduct appropriate compliance audits during the term of the contract taking into account the Appropriate Factors and timing of any renewals.

A compliance audit requirement is immediately triggered by any known breach or potential breach of our Statement of Business Ethics by the supplier.

McCullough Robertson undertakes the same actions and processes in assessing and addressing modern slavery practices and risks in their business operations.

In the next reporting period, taking into account Appropriate Factors, we aim to undertake compliance audits of existing supplier arrangements which have not been reviewed or audited since being engaged, not only when we become aware of a breach or potential breach, but on a biannual basis.

Supplier non-compliance

We do not engage suppliers who:

- refuse to commit to, or comply with, our requirements - particularly in respect of those principles set out in our Statement of Business Ethics; or
- are unable to provide appropriate evidence of steps we request to be undertaken to remediate any non-compliance issues.

Whenever our general due diligence steps or compliance audits indicate non-compliances impacting our ethical supply networks, those non-compliances must be closely assessed by the partner, officer holder, or employees responsible for the relevant supplier arrangement.

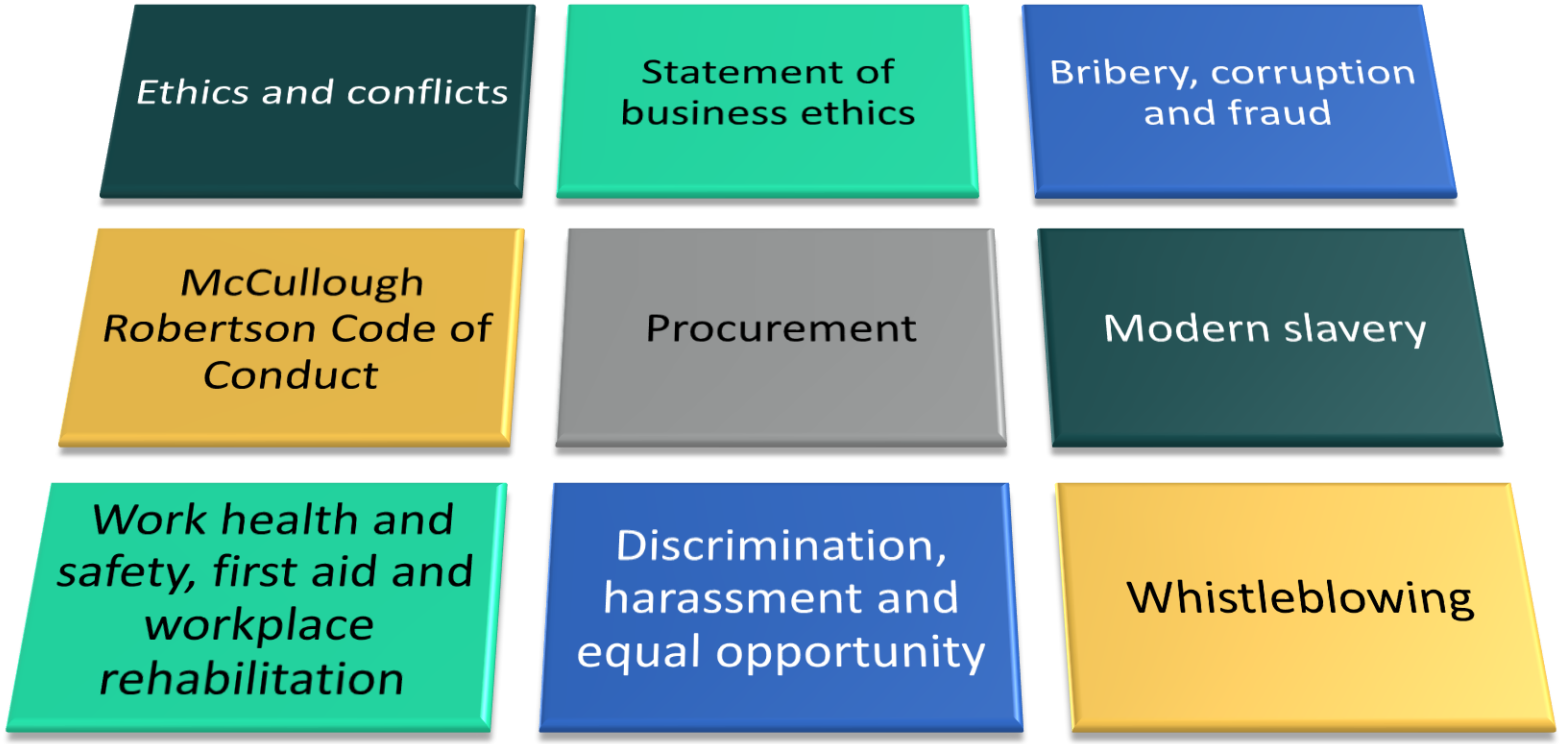
Where appropriate, we work with the supplier to develop a remediation plan (at the supplier's expense) with realistic time frames and with consideration given to Appropriate Factors. We are committed to working with our suppliers to enhance and develop their understanding and support their compliance with our requirements, where possible. We did not experience any non-compliance issues with our suppliers in the FY25 Reporting Period and therefore did not need to develop any remediation plans with any of our suppliers in the FY25 Reporting Period.

Should any significant area of non-compliance be identified, guidance is sought from our Chief Operating Officer, who may direct:

- the appropriate form of any remediation to be required of the supplier; or
- that the non-compliance is of a nature that requires the termination of our supplier arrangement.

Policies and procedures

Through continuous reviewing and updating of our policies and procedures, we address the risks of modern slavery practices to ensure we provide a fair and safe workplace for our partners, employees and suppliers. These policies include:



The policies and procedures above are reviewed and updated on an annual basis and are accessible to all employees. We aim to introduce additional procedures and checklists in the following reporting periods to ensure greater understanding and clear guidance for all relevant parties.

Employee awareness and training

Regular training on modern slavery, procurement, whistleblowing and McCullough Robertson Code of Conduct is provided throughout the firm.

Our training is reviewed annually as is our modern slavery framework.

In the FY25 Reporting Period, we conducted in person training sessions for all new starters to McCullough Robertson and annual refresher training on modern slavery risks and practices, along with the process for reporting, whistleblowing and complying with our code of conduct when working with suppliers and vendors.

In this FY25 Reporting Period we introduced additional targeted training across the organisation to employees in the procurement space. These sessions focussed on assessing and reporting of modern slavery risks in practice, including training on our supplier and vendor due diligence process and effective use of our contract register which records details with our suppliers, including completed ethical supply questionnaires. We will continue to provide targeted training to employees in the procurement space in FY26 Reporting Period, in addition to the existing firm wide training provided.

Additionally, in the FY26 Reporting Period, we aim to increase employee awareness on the issue of modern slavery and ensure we adopt increased reporting standards by referring to the use of an anonymous reporting hotline for employees of McCullough Robertson.

How do we assess the effectiveness of our actions

McCullough Robertson assesses the effectiveness of our actions and monitors our progress for continuous improvement in various ways. This includes:

- Reviewing the number of staff completing modern slavery training to assess whether the importance of this issue is appropriately emphasised, understood and channels for raising modern slavery activities are effective – in the FY25 Reporting Period, we had a range of employees from different levels undertake modern slavery training to gain a better understanding of modern slavery reporting processes
- Annually reviewing our modern slavery framework, including our procurement process and our supplier due diligence. Assessing compliance with McCullough Robertson Code of Conduct, policies and modern slavery framework
- Maintaining contracts register which records contract details with our suppliers, including completed ethical supply questionnaires. Delegation of responsibilities to procurement team members to appropriately manage supplier completion of ethical supply questionnaires – considering the Appropriate Factors, new suppliers in the FY25 Reporting Period completed an ethical supply questionnaire and have been included on our contracts register
- Management meetings with suppliers to review non-compliance and suitable remedial plans with such plans including due diligence and mechanisms assisting the supplier in ensuring compliance

We continue to acknowledge our obligations in ensuring adherence with the legislation and assess and action any modern slavery risks or practices with our suppliers and vendors supply networks. We will continue reviewing and updating our risk management mechanisms including policies, procedures and training.

We previously increased our engagement with suppliers, stakeholder groups and industry bodies in the FY24 Reporting Period. We have continued to increase our supplier contacts and monitored our suppliers' compliance within the FY25 Reporting Period, with the view to continue to increase engagement, supplier contact and mechanisms for monitoring our suppliers' compliance, along with enhancing our policies to align with evolving best practice standards and legislative expectations.

Consultation and approval

This statement has been prepared following consultation with McCullough Robertson's operational leadership team, including our Chief Operating Officer, Joint Managing Partners, and senior leaders within our information technology, risk and compliance, human resources and procurement teams. This leadership team together oversees the operational and procurement activity of McCullough Robertson and the entities it owns and controls (McCullough Robertson Group).

We maintain the same management systems, frameworks, policies and procedures amongst the different entities within the McCullough Robertson Group.

The statement is approved by all the Partners of the McCullough Robertson Group and signed by Kristan Conlon, Chair of Partners, on behalf of all partners, on 4 November 2025.

Kristan Conlon | Chair of Partners

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