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# Modern Slavery Statement

1 July 2022 – 30 June 2023

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

**CORRS  
CHAMBERS  
WESTGARTH**

*Sculpture by Kokatha and Nukunu artist Yhonnie Scarce*

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We acknowledge the First Peoples of Australia and their custodianship of Australian lands, including 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.

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## Message from the Chair of the Board and CEO

At Corrs, we believe that by actively working to identify, prevent and mitigate adverse human rights impacts in our own business and with our clients, we can contribute to a better, more sustainable future.

During the 2023 financial year we continued to improve upon our modern slavery risk identification and management. We strengthened the scope and depth of our supply chain due diligence, trained our people and our suppliers, and developed our understanding of best practice remediation practices.

We have achieved a lot during the last financial year however there is always more for us to do. We remain committed to further strengthening our response to modern slavery risks, in line 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

## 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 and Corrs Enterprises Holdings 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 is Corrs' fourth modern slavery statement, and has been prepared for the financial year of 1 July 2022 to 30 June 2023 (**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.

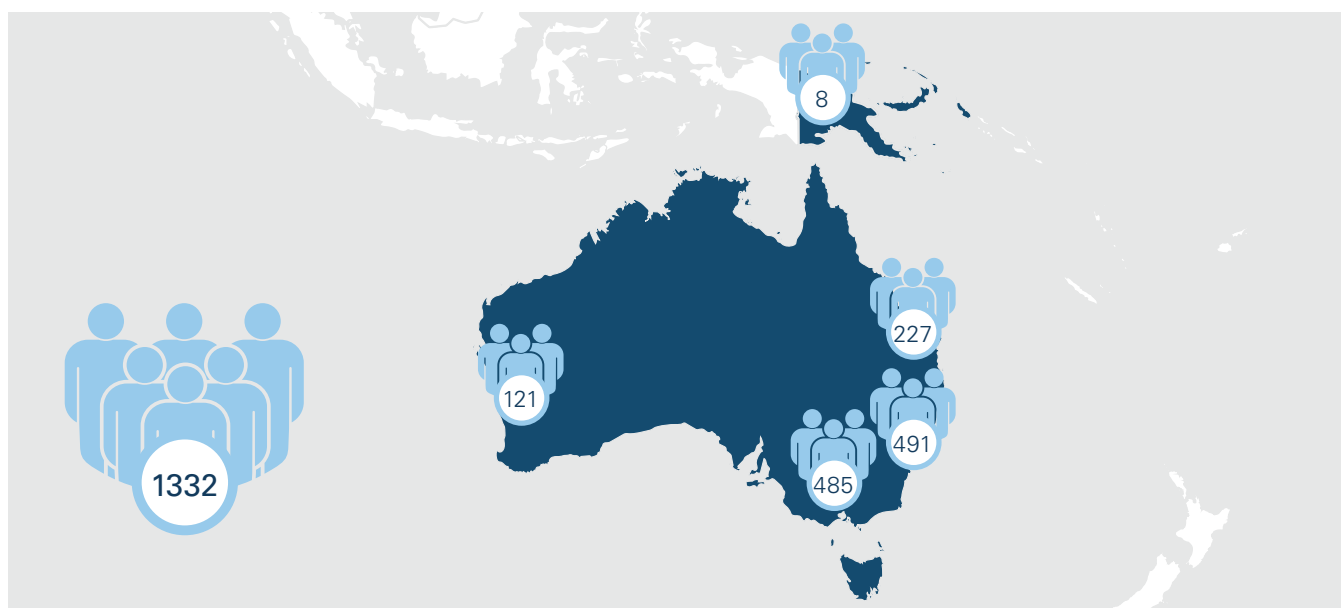
We are the firm of choice for many of the world's most significant organisations, with our people consistently recognised for providing outstanding client service and delivering exceptional results.

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.

## Our operations

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

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. We employ 1,332 employees across our operations.



Legal staff make up 71% of our people and provide legal advice to our clients across 19 practice groups.

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

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

Our professional services staff make up 29% of our people. 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, 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.

**Technology** is responsible for information technology (IT) 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 Legal Resourcing Pty Ltd (**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 141 lawyers in its candidate pool.

Orbit works in consultation with the business directly 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 Legal and Technology Pty Ltd (**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 innovation activities include Corrs Collaborate, which is 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.

## Our supply chain

As a professional services firm operating from offices around Australia and in Papua New Guinea, our supply chain predominantly consists of goods and services for the maintenance and servicing of our offices, facilities and support services which enable our personnel to serve our clients.

During the Reporting Period, our supply chain did not change substantially from the previous reporting period. We continue to use our cloud-based supply chain management platform to map our supply chain and assess modern slavery risks for our suppliers. Our supply chain management platform uses the Global Industry Classification Standard (**GICS**) to categorise risk.<sup>1</sup>

The key categories of our supply chain are described below:

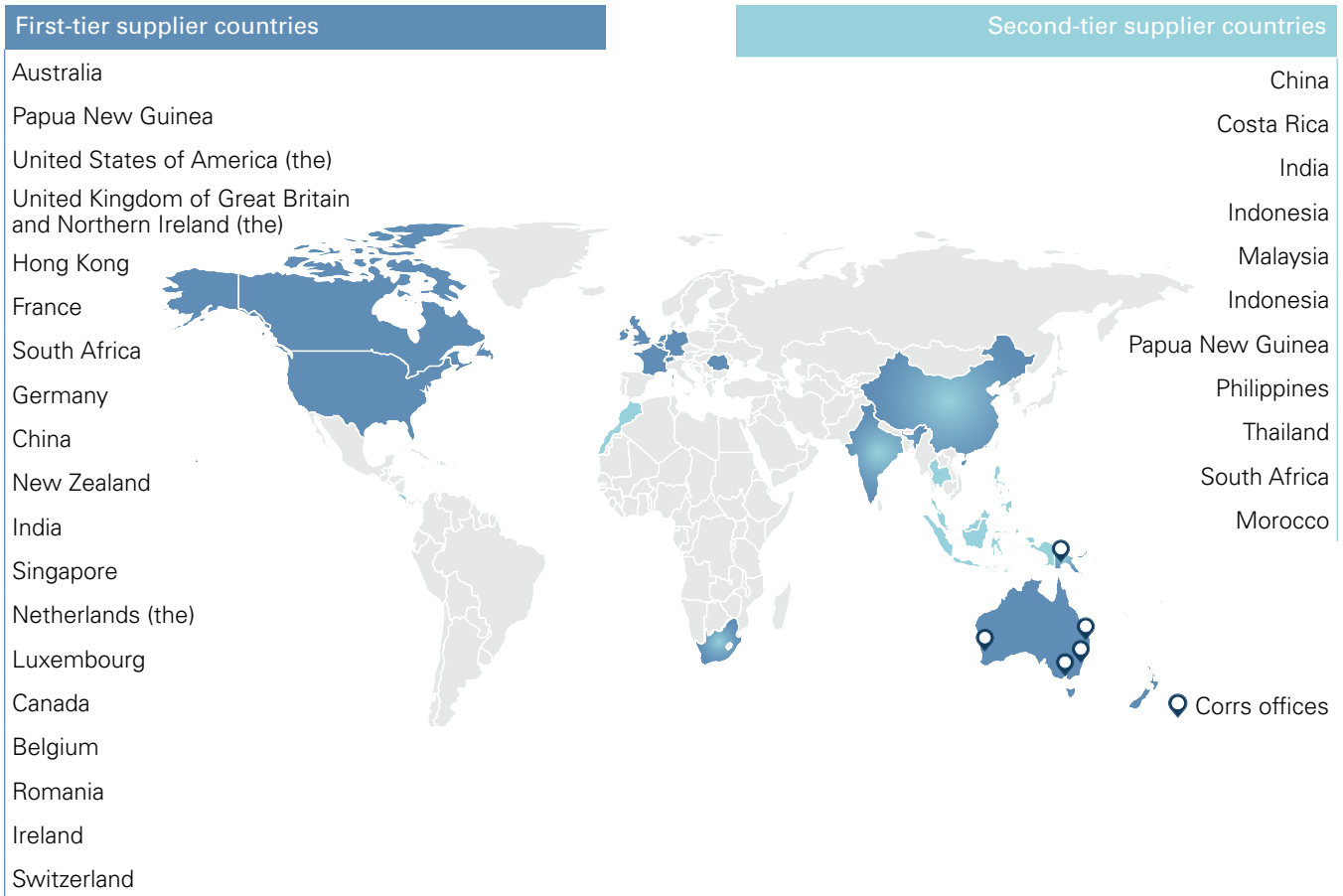
	Information and communication technology ( <b>ICT</b> ) and services (including hardware such as computers and phones, and software)
	Education and knowledge services
	Hospitality (such as catering and events services)
	Office furniture and supplies / consumables
	Merchandise and marketing
	Professional services (including financial services such as insurance and accounting)
	Human resources and employment services
	Business operations (such as leasing and facilities management, including cleaning, security, waste management, building operations, office maintenance services and materials)
	Transport and logistics
	Travel and accommodation

We procure goods and services from over **1,200** direct suppliers (our **First-Tier suppliers**). Approximately 82% of our First-Tier suppliers are based in Australia.<sup>2</sup> We also have suppliers based in Papua New Guinea, the United States of America, the United Kingdom, Hong Kong, countries in the European Economic Area, South Africa, China, New Zealand, India, Singapore and Canada.

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 (**Corrs Second-Tier suppliers**) located in other jurisdictions.

<sup>1</sup> More information on the Global Industry Classification Standard is [available here](#).

<sup>2</sup> Based on the location recorded in our invoice management system.



We are continuing to map our Second-Tier suppliers through our cloud-based supply chain management platform to better understand the modern slavery risk in the lower tiers of our supply chain. We note that some of our Second-Tier suppliers operate in jurisdictions where there is a higher prevalence of modern slavery practices and / or populations that are more vulnerable to modern slavery according to the Global Slavery Index (GSI)<sup>3</sup> and the United States Department of State Trafficking in Persons Report,<sup>4</sup> or where there are known risks of state-sanctioned forced labour, including the following jurisdictions:

- China
- Costa Rica
- India
- Indonesia
- Malaysia
- Indonesia
- Papua New Guinea
- Philippines
- Thailand

Countries where the prevalence or vulnerability to modern slavery practices is less clear include South Africa and Morocco.

## Papua New Guinea

Our Papua New Guinea office predominantly procures goods and services from the suppliers that service our Australian operations. For example, we procure laptops, audiovisual equipment, corporate travel management services and printing services from our Australian-based suppliers for our Papua New Guinea office. However, our Papua New Guinea office also engages 72 local suppliers who provide office cleaning services, corporate transport, and mobile phones and data services.

## Telesto and Orbit

Telesto and Orbit use the same suppliers as Corrs Chambers Westgarth for the majority of products and services they procure, including for ICT hardware and software. However, Telesto uses a different multi-factor authentication provider to Corrs Chambers Westgarth, and Orbit engages directly with a human resources service provider who undertakes background checks on behalf of employers when screening prospective Orbit lawyers.

<sup>3</sup> Walk Free Foundation, Global Slavery Index 2023, available [here](#).

<sup>4</sup> United States Department of State, 2023 Trafficking in Persons Report, available [here](#).



# Assessing and addressing risks of modern slavery

## Assessing our risks

We apply a human rights risk-based approach to assessing modern slavery risks in our operations and supply chain. Our assessment is informed by external datapoints such as the GSI and inherent modern slavery risks associated with jurisdiction, sector / industry, products and services and workforce. We overlay our assessment of inherent risks with the information we obtain through engagement with our suppliers.

## Our operations

Based on the following factors we have assessed 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;
- 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 when our people are working excessive hours, including alerts that are sent to partners and our People & Performance team to enable them to reallocate work; and
- 99.3% of our workforce is located in Australia, which is a low-risk jurisdiction for modern slavery according to the GSI, and do not perform work in any high-risk sectors.<sup>5</sup>

## Our suppliers

During the Reporting Period we again utilised our cloud-based supply chain management platform to engage with, and assess modern slavery risk for, our First-Tier suppliers. This platform administers our self-assessment questionnaires (SAQs), which ask our 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. The platform has enabled us to manage a high volume of data and assess our medium to high risk First-Tier suppliers.

In the previous reporting period, we sought to engage with 190 suppliers identified as inherently high risk. In the current reporting period we sent the SAQ to an additional 82 suppliers which we considered to have inherent risk rates of medium-to-high. This brings the total number of suppliers we have sought to engage with through our modern slavery program to 272 across FY22 and FY23.

Of the 82 suppliers we wrote to during the Reporting Period, 16 have completed the questionnaire and four have begun to engage with the process. 62 suppliers have not responded despite multiple attempts to engage. We also sent additional reminders to suppliers who have not responded to our communications in FY22, resulting in an additional eight suppliers completing the questionnaire. The level of responsiveness has been an ongoing challenge, and we will continue to develop strategies, such as offering training, to increase engagement during the next reporting period.

Of the 92 suppliers that have completed or partially completed the questionnaires issued in FY22 or FY23:

- 17% are required to report under the Modern Slavery Act or equivalent legislation in other jurisdictions;<sup>6</sup>
- over 60% indicated that they had a general understanding of modern slavery risks in their supply chain; and
- only 12.5% of the suppliers that completed an SAQ in FY23 had undertaken an internal or third-party modern slavery risk assessment on their operations and supply chain.

Many of the suppliers that indicated that they did not have an understanding of modern slavery risks in their supply chain were small businesses or sole traders operating in Australia. In some instances, we corresponded directly with these suppliers to understand their concerns and make them aware of how their responses to the SAQ enables us to identify and assess modern slavery risks in the products or services they supply to us or procure on our behalf. While some suppliers were receptive to this engagement, it only resulted in a few of them subsequently completing the SAQ. The limited information we receive from our suppliers remains a significant obstacle to fully understanding modern slavery risk in our supply chain.

<sup>5</sup> Ibid, pages 120 and 203.

<sup>6</sup> Only suppliers with 20 or more employees were asked to confirm whether they are reporting entities under the Modern Slavery Act or equivalent legislation in other jurisdictions.

## Identifying our key areas of risk

Our Responsible Business Working Group (RBWG) and members of our Responsible Business and ESG practice group oversee and provide input and guidance to review and develop our risk assessment for suppliers identified as high risk based on the risk ratings generated by the supply chain management platform. In addition, our Responsible Business and ESG practice group has significant legal expertise in the application of the United Nations Guiding Principles on Business and Human Rights (UNGPs). We use the UNGPs to inform our approach to modern slavery due diligence processes and systems, and where risk is identified, to assess our impact through the 'cause, contribute, directly linked' framework.

Key risk areas for modern slavery identified in our FY22 modern slavery statement remain the same for this Reporting Period and include facilities (including cleaning, car parking, security and other services), information and communications technology, and suppliers operating in Papua New Guinea. During this Reporting Period we added travel services (including transport and accommodation) and suppliers using labour outsourcing to the key focus areas. During the Reporting Period we also assessed our suppliers of knowledge services as a moderate risk for modern slavery, given our limited visibility over their operations and supply chain.

## Addressing key areas of risk

In this Reporting Period, we focused on building our understanding and identifying modern slavery risks arising in five of our high-risk areas – facilities, information and communications technology, suppliers using labour outsourcing, travel services and suppliers operating in Papua New Guinea.



Facilities (including cleaning, car parking, security and other services)

### General observations

With five offices throughout Australia and Papua New Guinea, and the knowledge that cleaning is a high-risk service sector in Australia and elsewhere,<sup>7</sup> in this Reporting Period we continued to focus on our cleaning contractors.

This work has occurred across our four Australian offices and we have initiated engagement with a new cleaning provider in Papua New Guinea. Cleaning contractors for our Australian offices are provided by the landlords for each of our four commercial tenancies. In Papua New Guinea we engage our cleaning contractor directly.

### Specific actions

#### Cleaning

We engaged with the landlords of our various tenancies and assessed their risks of modern slavery on the basis of a number of measures, including their engagement with the Cleaning Accountability Framework (CAF).<sup>8</sup> Overall, we have assessed the risk of modern slavery posed by our cleaning suppliers to be low due to compliance with CAF standards and the suppliers' own modern slavery policies and practices.

<sup>7</sup> Walk Free Foundation, Submission No 91 to Joint Standing Committee on Foreign Affairs, Defence and Trade, Parliament of Australia, Inquiry into Establishing a Modern Slavery Act in Australia (May 2017), 10–11.

<sup>8</sup> CAF is an independent, multi-stakeholder certification scheme developed to address supply chain risks in the cleaning sector. CAF engages in a pre-qualification process with cleaning service providers who voluntarily submit themselves to audits by CAF of their policies, payroll and operations to assess whether the cleaning supplier is complying with labour and anti-slavery laws. CAF engages in a certification process with landlords and property managers to audit the cleaning services provided to a property and to certify the entire property as compliant.

Cleaning services suppliers assessment and actions		
Office	Landlord's modern slavery risk management	CAF status of supplier
<b>Melbourne</b> Risk rating: LOW	Landlord has an internal Modern Slavery Working Group with which it consults when engaging in the tender process for cleaning services suppliers. The landlord is also a reporting entity under the Modern Slavery Act.	CAF Member and one of only four CAF 3 Star Prequalified Contractors.
<b>Sydney</b> Risk rating: Pending	Landlord requires that all contractors are enrolled on the Property Council of Australia (PCA) / Informed365 database and that they participate in the landlord's modern slavery assessment processes. We have requested a letter of modern slavery accreditation for our Sydney office.	Not pre-qualified. The supplier has received modern slavery accreditation for another site and submits its own modern slavery statement.
<b>Brisbane</b> Risk rating: LOW	Landlord has several CAF-certified buildings in its portfolio and requires the cleaning contractor to comply with the CAF Framework, Core Principles and Code of Conduct.	Not pre-qualified but submits a modern slavery statement and has its own Modern Slavery Framework.
<b>Perth</b> Risk rating: LOW	Landlord upholds CAF principles and has a risk-based program in place which includes supplier due diligence and risk assessments. This includes incorporating contractual commitments in respect of conduct and ethics, anti-bribery and corruption, whistleblowing protections, prevention of modern slavery, and human resources and labour guarantees including the right to work, labour hire and procurement processes, and diversity and inclusion practices.  Landlord also conducts internal audits to continually assess whether its cleaning and security contractors meet expectations and abide by their contract.	CAF Member and is continuing to work towards certification of buildings in which it operates. Publishes its own modern slavery statement.

### Other facilities

We remain focused on understanding and identifying any risks that may be present in other areas of work associated with maintaining our offices and facilities, including those responsible for car parking, security and maintaining the plant, equipment and furnishings.

During the Reporting Period we continued to engage with our external commercial facilities manager, which contracts and manages our catering, copy centre, utilities and energy, and maintenance services suppliers in our Australian offices.

Our facilities manager manages over 100 third-party supplier contracts on our behalf and is required to comply with our policies, including the Ethical Sourcing Policy and the Corrs Group Minimum Supplier Standards (**Minimum Standards**).

Our facilities manager implements a global ethical procurement system to assess and manage modern slavery risks for its suppliers (i.e. Corrs Second-Tier suppliers).

Modern slavery risk management is incorporated into our facilities manager's:

- **Contractual requirements** – including that its suppliers agree to abide by our facilities manager's global Human Rights Policy and Vendor Code of Conduct, comply with modern slavery laws and refrain from engaging in modern slavery, forced labour and human trafficking.
- **Onboarding processes** – including prequalification reviews.
- **Ongoing supplier due diligence** – including performance scorecards, reporting and audits.

Our facilities manager also has a remediation framework and a hotline which can be used by anyone (including suppliers) to confidentially report any actual or suspected instances of modern slavery.

In addition, before a supplier is engaged, our facilities manager requires them to complete an RFP process which includes three detailed modern slavery questions. If the supplier does not answer these questions properly or to the satisfaction of our facilities manager, they will not be a preferred vendor and will not be engaged. Our facilities manager also conducts audits of each suppliers' modern slavery RFP responses and commitments every six months.

Our facilities manager trains its direct employees to understand, identify and mitigate risks of modern slavery, identify red flags and report suspected issues. It also has a modern slavery subject matter expert in its procurement team.

Our facilities manager is contractually required to raise any modern slavery concerns with us directly, and to date no specific modern slavery concerns have been raised.

We are satisfied that our facilities manager has comprehensive systems to actively identify, assess and mitigate modern slavery risks. We will continue to engage and work closely with our facilities manager in future reporting periods.



## Information and communications technology

### General observations

As reported in previous statements, ICT continues to pose risks of modern slavery that are particularly challenging for professional services firms as we are reliant on this technology and hardware to perform our core operations. ICT supply chains carry an inherently high risk of modern slavery due to the raw materials used in ICT hardware. These include conflict minerals and commodities like cobalt that are well known for having significant risks of child and forced labour. This is in addition to the operational risks of ICT manufacturing and customer support services being located in high-risk jurisdictions. There is also limited publicly available information to determine from where individual ICT inputs are sourced.

Approximately 48% of our supply chain is comprised of companies who provide ICT products and services, including computer and mobile hardware and software. Of these suppliers, only 10% have completed our SAQs and 23% have partially completed the questionnaire. Of the suppliers who have responded, 18% supply products that contain high risk inputs and raw materials, including batteries, aluminium, cobalt and copper.<sup>9</sup>

We continue to find it challenging to build and use our leverage to engage with our ICT suppliers around the measures they take to assess and address modern slavery risks in their operations and supply chains, despite the widely accepted inherent modern slavery risks related to the products we procure.

In addition, during the Reporting Period we looked more closely at our software as a service (SaaS) and knowledge service providers, including suppliers of virtual document exchange services and virtual data room and cloud services. After engaging with a number of these suppliers and doing further research, we determined that the higher modern slavery risk remains in our ICT hardware supply chains.

### Specific actions

Addressing technology-related risks will only be achieved by collaboration between businesses and others making coordinated commitments across sectors and jurisdictions. During the Reporting Period we engaged with other law firms on this issue through the Australian Legal Sector Alliance (AusLSA), an industry-led association that works collaboratively to promote best practice, responsible governance and sustainability across the legal sector. Through our AusLSA membership, we have been involved in numerous roundtable discussions, including on modern slavery issues and technology.

Through this collaboration our technology team has formed connections with other law firms where information and ideas are shared. As a result, we learned of an organisation that provides services to recycle ICT hardware into lower socio-economic communities, keeping hardware out of landfill. It also breaks down the raw materials of IT equipment that cannot be re-purposed and puts those materials (such as cobalt and plastics) back into the market. We will continue to collaborate with other law firms and industry groups to increase our understanding of how the legal and other sectors can source ICT hardware responsibly.

We have also continued to identify other multi-stakeholder organisations that we can engage with to better understand the work they are doing to protect the rights of workers in electronic supply chains and to seek opportunities contribute to multi-stakeholder initiatives to address these risks.

<sup>9</sup> We note, however, that this response is based on the suppliers' overall operations. Many suppliers have various products and services, and therefore may not supply Corrs with those products that contain raw materials.



## Case study

### Child labour in artisanal cobalt mining

During the last Reporting Period we began working with Save the Children Australia (STC) on an initiative that would provide an opportunity for participating Australian businesses (including Corrs) to support a program that is working to remediate child labour in the artisanal cobalt mining sector in the Democratic Republic of Congo (DRC).

There are significant challenges in accessing supply chain information to determine whether electronics we procure contain cobalt mined with child or forced labour. Cobalt is a critical mineral used in the manufacture of consumer and workplace electronics like mobile phones, laptops and chargers. More than 70% of the world's cobalt is mined in the DRC.<sup>10</sup> Cobalt sourced from artisanal and industrial mining in the DRC is typically co-mingled by smelters or traders before being sold on to battery manufacturers, meaning it is difficult if not impossible to trace the origins of cobalt used in the electronics we procure. Acknowledging the industry-wide issue of supply chain traceability, we engaged with STC to explore opportunities to address modern slavery risk in our ICT supply chains through remediation initiatives.

Throughout the Reporting Period we worked closely with STC to help with the launch of the Child Labour Remediation Hub (CLR Hub), and we co-hosted the launch event in August 2023. CLR Hub is an initiative developed by STC, which provided our clients and peers with an opportunity to learn more about the endemic issue of child labour in artisanal cobalt mining in the DRC and potential remediation solutions for businesses exposed to this risk in their supply chains. Located in Kolwezi, DRC, the CLR Hub aims to support families to keep children out of artisanal mining and provides access to education, integration, living stipends and health and psychosocial support for children who are found to have been engaged in child labour.



## Suppliers using labour outsourcing

When responding to our SAQ, a number of our First-Tier suppliers have indicated that they outsource labour to foreign jurisdictions that are higher risk for modern slavery. This limits our visibility over our suppliers' operations and presents an increased risk of modern slavery in lower tiers of our supply chain.

Of the 92 suppliers who have completed or partially completed our SAQ to date (i.e. in either FY22 or FY23), 64.15% outsource labour to foreign jurisdictions. Of these suppliers, approximately 24% outsource operations to the Philippines, 15% outsource to India and 6% outsource to China, all of which are jurisdictions that are considered to have a higher prevalence of modern slavery according to the GSI,<sup>11</sup> or have known risks of state-sanctioned forced labour.<sup>12</sup>

The majority of these suppliers operate in the ICT sector, outsourcing operations such as support centres, manufacturing facilities and data centres. As discussed above, we are committed to engaging more closely with our ICT suppliers to better understand and manage the modern slavery risks they present.



## Travel services (including transport and accommodation)

During the Reporting Period, staff travel, both domestically and internationally, has significantly increased. As such, we have begun engaging with our travel providers (including transport and accommodation suppliers) to better understand and address the modern slavery risks in the industry.

We also engaged a new corporate travel agent during the Reporting Period who will look after all our domestic and international travel requirements. This supplier completed our standard supplier onboarding process and has agreed to comply with our Minimum Standards. This also requires them to ensure their suppliers adhere to the Minimum Standards.

Both the transport and accommodation industries are known to carry high risks of modern slavery due to the international workforce and multi-jurisdictional operations of many airlines, the high number of lower-skilled roles employed by hotel operators (such as cleaning, kitchen and maintenance staff), and reliance on complex global supply chains.

<sup>10</sup> Amnesty International, 'DRC: Powering Change or Business as Usual?' Report, September 2023.

<sup>11</sup> Walk Free Foundation, Global Slavery Index 2023, available [here](#).

<sup>12</sup> United States Department of State 2023 Trafficking in Persons Report, available [here](#).

Transport and accommodation services themselves can also be used to facilitate modern slavery practices, particularly human trafficking, by individuals and other corporations. We have reviewed the modern slavery statements of our key transport providers, who recognise this risk and have systems in place (including staff training) to help prevent, identify and report suspected instances of human trafficking.

To mitigate this risk, we have engaged with our corporate travel agent to ensure agreements with preferred transport and accommodation providers incorporate modern slavery provisions. Many of our suppliers are themselves reporting entities under the Modern Slavery Act. The modern slavery statements those entities submit detail their processes and procedures to assess and address modern slavery risks in their own operations and supply chain.

Based on our engagement with our airline providers we have determined that our suppliers of transport services have systems and processes in place that appropriately manage and mitigate the inherent modern slavery risk for airlines.

We have also begun to review the systems and processes detailed in the modern slavery statements for some of our preferred accommodation providers, who are typically large hospitality businesses. We are committed to working more closely with our corporate travel agent and our preferred accommodation providers in the next reporting period to consider how we can enhance our assessment and mitigation measures to address, in our suppliers, the inherent risks of modern slavery in the hotel industry.



## Suppliers operating in Papua New Guinea

Papua New Guinea is ranked higher risk for modern slavery by the GSI. We have 72 suppliers in Papua New Guinea, and approximately 40 of these suppliers operate in sectors and industries that are inherently high risk for modern slavery, including facilities, transport and logistics and travel and accommodation. The remaining suppliers provide professional services.

We have made progress in assessing and addressing modern slavery risks for our Papua New Guinea suppliers during the Reporting Period. A supplier who provides our Papua New Guinea office with technical support (including internet and telephone services) has completed our SAQ and has been evaluated as low risk. This supplier confirmed that it has undertaken an internal modern slavery risk assessment on its supply chain and operations, and requires its own suppliers to comply with its policies and all legal requirements.

We are also in the process of engaging a new cleaning supplier for our Papua New Guinea office. Engagement with this new supplier is ongoing, however they have agreed to comply with our Minimum Standards. We have confirmed that this supplier takes steps to manage and mitigate modern slavery risk in their operations by hiring local staff only (no use of labour hire contractors) and training all staff before they commence in their roles.

We continue to take steps to improve oversight of suppliers supporting our Papua New Guinea office, and to encourage completion of the supplier SAQ. However, our progress has been slower than the process to establish oversight of the supply chains for our Australian operations. This is in part due to some of our smaller Papua New Guinea suppliers' limited resources and capacity to respond to our requests for information relating to modern slavery risk factors. These information gaps are made more difficult to address in the regulatory context of Papua New Guinea, where there is no equivalent domestic regulation or legislative framework requiring suppliers to monitor, document or audit labour conditions or modern slavery risks in their operations or supply chains.



### Case study Airline agreement

During the Reporting Period, we engaged in negotiations with an airline provider in relation to an agreement to facilitate staff travel. We ensured that these included discussions about modern slavery compliance and our Minimum Standards. As a result, the airline agreed to the inclusion of a comprehensive modern slavery clause in the final agreement. This includes requirements to comply with the Modern Slavery Act and confirms that the airline provider takes proactive action in relation to modern slavery in its operations and supply chain (including having necessary policies and procedures in place and implementing appropriate due diligence and remediation programs). The airline provider also confirmed that it has policies and processes in place to drive sustainable and ethical business practices in line with our Minimum Standards.

## Governance and management

During the Reporting Period our efforts to assess and address modern slavery risk in our operations and supply chain continued to be guided by the policies and procedures listed in the table below.

These have been described in detail in our previous modern slavery statements,<sup>13</sup> and include:



Policy and accountability framework



Supplier due diligence



Collaboration and education

### Accountability for our policies and processes

Policy	Owned by
Corrs Group Ethical Sourcing Policy	General Counsel
Corrs Group Supplier Minimum Standards	General Counsel
Anti-Bribery and Anti-Corruption Policy	General Counsel
Health and Safety Policy	Chief Operating Officer and Chief People Officer
Respect in our Workplace Policy	Chief Operating Officer and Chief People Officer
Gender Equality Policy	Partner – Gender Equality and Chief People Officer
Diversity and Inclusion Policy	Partner – Diversity and Inclusion and Chief People Officer
Whistleblower Protection Policy	Ethics and Conflicts Partner

During the Reporting Period we developed a Modern Slavery Remediation Framework which will be finalised and adopted in the next reporting period. We also reviewed and updated our Whistleblower Protection Policy in June 2023, and we will continue to review our policies and procedures related to modern slavery during the next reporting period to ensure these policies reflect best practice.

## Responsible Business Working Group



During the Reporting Period, our Responsible Business Working Group (**RBWG**) continued to progress and expand its activities in respect of modern slavery.

The RBWG includes representatives of the Corrs partnership and from our business services, including our people and performance and risk and compliance functions. The RBWG meets regularly to review progress against our commitments and targets and to discuss and resolve issues that arise. The work undertaken by the RBWG informs our modern slavery risk assessment and provides oversight of supply chain risks that may arise in different parts of our operations and supply chain.

The Chair of the RBWG updates the board annually and will report any material issues to the Boards of Corrs Chambers Westgarth and Corrs Support Services Pty Ltd through the Audit and Risk Management Committee (**ARMCO**). The board is responsible for approving the modern slavery statement. The RBWG is also assisted by the legal professionals in our Responsible Business and ESG practice group who have expertise in business and human rights. A member of the RBWG also sits on ARMCO.

<sup>13</sup> See Corrs Chambers Westgarth, Modern Slavery Statement 1 July 2020 - 30 June 2021, p 9.

## Contracts and supplier onboarding process

We recognise that contracting and supplier onboarding processes provide us with an opportunity to ensure our business partners are aware of our commitment to mitigating and preventing modern slavery. We also use this opportunity to outline our expectations of them in assisting us to implement this commitment (as set out in our Minimum Standards). One way we use our leverage is at the beginning of our engagement with a supplier and when negotiating terms of renewed supply agreements we request that all suppliers indicate whether they are able to meet, or work towards meeting, our Minimum Standards. We endeavour to ensure all suppliers receive a copy of our Ethical Sourcing Policy and Minimum Standards at an early stage in the tendering and contracting process. Early engagement also enables us to assess our suppliers' internal capacity and understanding of modern slavery and the requirements contained within these documents.

Our standard supplier contract and tender templates incorporate a modern slavery clause and we continue to monitor the adoption of modern slavery clauses in new or renewed supplier agreements.

We acknowledge that contractual commitments are not sufficient to address risks of modern slavery in our supply chain and must be supplemented with due diligence to ensure these commitments are operationalised effectively. However, our standard modern slavery clauses do provide us with a contractual lever to obtain information and/or assistance from suppliers to inform our identification of risks, risk assessments and responses to actual or potential modern slavery practices in their operations or supply chains.

During the reporting period, we updated our Human Rights and Modern Slavery online learning module (see 'Internal capacity-building' section on page 19) and there was a targeted roll-out of this training to personnel responsible for procurement.

### Supplier onboarding process

Issue Request For Tender that requires a statement of capacity in respect of modern slavery risk management

Provide prospective supplier with Minimum Standards before they are engaged



Supplier confirms whether they are able to comply with Minimum Standards



If unable to comply, supplier to commit to moving towards compliance within an agreed time frame.  
If the supplier cannot commit to moving towards compliance, Corrs will consider alternate suppliers



Where there is any doubt relating to a supplier's ability to meet the Minimum Standards, seek clarification from supplier and refer to Corrs General Counsel



## Grievance and remediation

As noted in our previous statements, Corrs employees may make an anonymous report of human rights or modern slavery concerns under our Whistleblower Protection Policy. The firm has appointed a Whistleblower Contact Officer (WCO) who is authorised to receive and action reports, to refer to the Ethics and Conflicts Partner for investigation, and to protect the whistleblower's interests.

If people wish to keep their identity confidential, the WCO will omit their name and signature from the report that is sent to the Ethics and Conflicts Partner.

Currently, individuals (including workers in our supply chain) may report concerns directly to our Head of Responsible Business and ESG, who will consider and address any grievances as part of our commitment to the UNGPs and compliance with modern slavery legislation.

Remediation is a critical part of responding to modern slavery. During the Reporting Period we developed a Modern Slavery Remediation Framework, which will be finalised and implemented in the FY24 reporting period. The draft Framework was developed by legal professionals in our Responsible Business and ESG practice group and is designed to ensure we safeguard victim-survivors and respond to instances of modern slavery in accordance with the UNGPs. In our previous statement we indicated that we were considering opportunities to make a grievance mechanism available to our suppliers. During the Reporting Period we re-prioritised our actions and determined that our Modern Slavery Remediation Framework would be our priority action for FY23. We continue to consider options for formalising and improving our current reporting mechanism.

In our previous statement we noted our commitment to building the capacity of our WCO in responding to modern slavery concerns. We provide training to our WCO on a biannual basis, and we have determined that their next training session (which will occur in the next reporting period) is the best forum to build this capacity. As such, we are committed to incorporating capacity building and education around victim-centred approaches to modern slavery reporting and the application of our Modern Slavery Remediation Framework in our WCO training program going forward.



### Case study

#### Intractable challenges: Remediating victims of modern slavery

In the course of developing our Modern Slavery Remediation Framework we grappled with a common issue faced by professional services firms and other corporates – how to remediate modern slavery occurring in the lowest tiers of the supply chain for high-risk commodities.

Many businesses commit to use their leverage to influence entities throughout the supply chain to ensure the victims and human rights impacts of modern slavery are remediated appropriately by the entity causing the harm. However, this approach is ill-suited to complex and convoluted global supply chains where there is little or no visibility over the working conditions for individuals involved, often in the informal economy, in mining or processing raw materials.

This lack of visibility is often compounded by lack of transparency around which entities in the lower tiers of the supply chain are causing the harm. This lack of transparency is particularly acute in the global supply chains for cobalt which is used in manufacturing workplace electronics. We recognise that our operations as a professional services firm create increased demand for high-risk products like workplace electronics, and this demand exposes vulnerable workers to exploitation.

One mechanism for addressing these harms that we are continuing to explore is remedy at source, through reparations or remediation for victims of modern slavery in industries and sectors involved in producing the goods we procure. We acknowledge that the people remediated will not necessarily be the individuals who mined or processed the materials used in the products we procure, due to the lack of supply chain transparency described above. Much like carbon offsetting, providing remediation to groups vulnerable to exploitation in these industries or sectors, even in circumstances where we are not able to identify the precise individuals harmed by our procurement practices, may be a measured way to address some of the intractable human rights.

## Collaboration and education

Fundamental to our strategy for identifying and addressing risks of modern slavery is continually improving and building upon our internal and community engagement with modern slavery prevention and mitigation, and businesses' responsibility to respect human rights more broadly.

During the Reporting Period, Corrs continued to develop its external engagement with industry and civil society, as well as its internal education on modern slavery.

### External collaboration

Corrs endeavours to actively contribute to the modern slavery community and improve our stakeholder engagement. During the Reporting Period, we:

- 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 in respect of supply chain and modern slavery risk management. Aligned with the purpose of the MSCoP, we support our internal RBWG as well as other members in responding to increased regulatory movements on modern slavery and human rights due diligence. Topics of focus in the Reporting Period included measuring the effectiveness of modern slavery actions and modern slavery risks for migrant workers.
- Hosted the 'Modern Slavery Collaborator Roundtable: Business Pathways to Human Rights Due Diligence' with UNGCNA. This event convened human rights practitioners, civil society, investors and government representatives to discuss global developments in human rights regulation with a focus on mandatory human rights due diligence.
- Sponsored the Australian Human Rights Institute on the human rights impacts of mega sporting events and the responsibility of businesses to respect human rights when they are involved in the development, delivery and marketing of these events.
- Attended the UN Forum on Business and Human Rights in Geneva.

- Collaborated with international law firms to establish the Business and Human Rights Lawyers Association (BHRLA) in November 2022. The objective of the BHRLA is to facilitate capacity building, thought-leadership and industry collaboration for law firms advising on business and human rights issues. We also hosted the Australian launch event for the BHRLA, which involved a panel discussion on the role of business and human rights lawyers in helping organisations in the financial sector to manage human rights risks.
- Attended the Australian Government Modern Slavery Consultation.
- Collaborated with Save the Children on an initiative to address child labour in artisanal cobalt mining in the Democratic Republic of the Congo.

### Education

Corrs is committed to contributing to the ongoing modern slavery dialogue in Australia and the education of our clients and the Australian business community.

During the Reporting Period, we delivered, participated in, or facilitated the following education events on modern slavery and its human rights impacts in partnership with clients, pro bono partners and other stakeholders:

- client continuing professional development (CPD) sessions and presentations on ESG issues and regulation, including the Modern Slavery Act;
- internal sessions on responsible business and ESG issues, including modern slavery and businesses' responsibility to respect the UNGPs, for our staff; and
- various external events and panel discussions considering responsible business and ESG issues, including modern slavery, human rights due diligence and human rights regulation in Australia and overseas.

Throughout the Reporting Period, 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.

Some of the publications we released during the Reporting Period include:



Corrs also contributed the Australia chapter to Mondaq's global ESG Comparative Guide 2022. The ESG Comparative Guide provides an overview of ESG regulatory environments and laws in multiple jurisdictions globally.

## Internal capacity-building

Completing our Human Rights and Modern Slavery online learning module is a mandatory requirement for all new and existing staff – from business services through to Partners. In this Reporting Period there was also a targeted roll-out of the training to our personnel who engage with procurement. As at the end of the Reporting Period, 501 legal staff had completed the training module.

During the Reporting Period, we completed significant updates to our internal online learning module. The updated module provides comprehensive explanations of international human rights law, the business responsibility to respect human rights and what this requires, modern slavery risks and how to identify and address them, and how to remediate human rights harms to which Corrs has contributed, caused, or is directly linked. The updated module includes interactive exercises for staff to test their understanding of the issues covered by the training and updated analysis taken from the 2023 GSI.

As part of expanding our internal capacity and mechanisms to assess and address modern slavery, we will adopt and implement our draft Modern Slavery Remediation Framework (see page 17) and provide training to relevant staff on the guidance and requirements set out in that document.

## Are we making a difference?

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 used the following three key measures to assess the effectiveness of our actions to assess and address modern slavery risk in our operations and supply chain:

1. Implementation of our Ethical Sourcing Policy and Minimum Standards.
2. Supplier engagement.
3. Internal engagement.

After considering whether our governance framework was working effectively, we concluded that our Ethical Sourcing Policy, Minimum Standards and other policies should be supplemented by a specific Modern Slavery Policy, which we intend to adopt in FY24. We will also review our modern slavery governance framework and consider appropriate avenues for more regular reporting to ARMCO on modern slavery risk.

### Implementing our Ethical Sourcing Policy and Minimum Standards

During the Reporting Period, we had increased engagement with our suppliers about the importance of modern slavery risk management and sought to enhance their awareness of our Minimum Standards. For example, and as discussed above, after lengthy negotiations our new cleaning supplier in Papua New Guinea has agreed to comply with our Minimum Standards. For other suppliers we developed alternate contractual terms to provide assurance that the supplier had in place appropriate systems and processes to manage modern slavery risk despite those suppliers not agreeing to adhere to our Minimum Standards.



#### Case study Knowledge service providers

During the Reporting Period, we engaged with a number of our knowledge service providers in relation to the requirements of our Ethical Sourcing Policy and Minimum Standards. Several of our knowledge service providers declined to include our standard form modern slavery clause, which includes a requirement to adhere to our Minimum Standards and hold their own suppliers to the same standard, in their supply agreements.

Generally this reluctance was due to the fact that they are large, often multinational, organisations and were unable or unwilling to be bound by a third party's code of conduct given the administrative burden it would impose on the organisation. However, we engaged with each of these suppliers, and in most cases, we were able to come to a satisfactory outcome. For example, the inclusion of a clause that enables Corrs to rely on statements and commitments contained in the supplier's modern slavery statement or other publicly available documents, which indicate that the supplier has appropriate systems and processes to manage modern slavery risk in their operations and supply chain.

## Supplier engagement

We continued to face significant obstacles in achieving consistent supplier engagement with the technology platform and uptake of our supplier SAQ during the Reporting Period. Since we implemented our cloud-based modern slavery supply chain management platform, we have sought to engage 272 suppliers.



272 suppliers contacted

65 suppliers have completed questionnaire

27 suppliers have commenced questionnaire

180 suppliers have not started questionnaire

During the Reporting Period, we followed up a number of suppliers who had not completed the supplier SAQ in the previous Reporting Period, including via phone and email reminders, and maintained a detailed register of our efforts to contact each supplier. Wherever possible, we also leveraged contract renewals and major purchases to seek responses from suppliers that had not previously engaged.

As in previous reporting periods, some of our larger suppliers declined to respond to our inquiries on the basis that the size and scope of their operations makes it administratively burdensome to engage with individual customers. Those suppliers have referred us to their publicly available reports and policies containing the information required to assess their modern slavery risks, including their compliance with our supplier Minimum Standards. These documents typically included their modern slavery statements, human rights / modern slavery policies and supplier minimum standards.

As noted throughout this Statement, we have also had some difficulty engaging our suppliers in Papua New Guinea. Although the use of our supply chain management platform enables us to obtain and manage more precise and detailed supply chain information to inform our modern slavery risk assessments, we rely on consistent engagement from all suppliers to ensure the data is accurate. We will continue to take actions to increase

our suppliers' awareness and understanding of modern slavery risks and promote their engagement with our modern slavery policies and procedures in future Reporting Periods to enhance the effectiveness of our risk assessments and increase visibility over our supply chain, including Corrs Second-Tier suppliers. As the level of engagement with our SAQs remains low, we will consider whether alternative strategies are needed to engage with our suppliers more effectively.

To improve the level and quality of our supplier engagement, and assist smaller suppliers with capacity building, we made a training session available to over 250 of our suppliers in June 2023. This webinar was run 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

The training addressed the following key issues:

- What are the recent recommended changes to the Modern Slavery Act? What do I need to know?
- My business is not required to submit a modern slavery statement, so why is this relevant to my business?
- What are the emerging risks of modern slavery in Australian supply chains and how do I identify those risks – what indicators should I be looking for?
- How do I comply with Corrs' Supplier Minimum Standards and the varying requirements across all of customers?

We note that attendance at this training was low, and in future reporting periods we will develop strategies to improve engagement with our suppliers through our annual supplier training.

## Internal engagement

During the Reporting Period, we did not receive any reports or complaints of potential modern slavery through our internal whistleblowing processes. We understand that the absence of grievances cannot be taken to demonstrate an absence of modern slavery risk or instances of modern slavery practices in our operations and supply chain. It may indicate a need to develop our internal capacity building so the personnel responsible for recruitment and procurement in our business (particularly where those roles engage with high-risk sectors or workforces) have a robust understanding of how these risks manifest for a professional services firm.

In the next Reporting Period we will finalise our Modern Slavery Remediation Framework and we will develop training for our legal and business services staff and suppliers to ensure relevant stakeholders are encouraged to raise modern slavery related grievances and are informed of the process we will follow where such grievances are raised.

## Future endeavours

### Supplier due diligence and engagement

- Develop strategies to increase the level of engagement and responsiveness from our suppliers to our SAQ, particularly for our Papua New Guinea suppliers.
- Continue to take steps to establish greater oversight and transparency of our Papua New Guinea supply chain.
- Enhance the penetration of our risk assessments and increase visibility over our supply chain by increasing our suppliers' understanding of modern slavery risks and the importance of their engagement with the issue.

### ICT

- Collaborate with industry groups to increase our understanding of how the industry can responsibly source ICT hardware.
- Engage more closely with our ICT suppliers to encourage greater engagement and SAQ completion rates.
- Explore ways in which we can mitigate the impacts of modern slavery in downstream ICT supply chains.

### Governance and management

- Continue to review our policies and procedures related to modern slavery during the FY24 reporting period to ensure these policies reflect best practice.
- Finalise and implement our Modern Slavery Remediation Framework.
- Finalise and implement our Modern Slavery Policy.
- Introduce more regular reporting to ARMCO.

### Education and training

- Incorporate capacity building and education around victim-centred approaches to modern slavery reporting in our WCO training program.
- Undertake internal training on our Remediation Framework.
- Communicate our expectations in respect of remediation.
- Expand upon and increase the frequency and extent of training provided to our operations and procurement teams.
- Provide annual training to our suppliers.

### Other activities

- Continue to actively participate in the BHRLA.

## 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 RBWG is responsible for advising on the development and implementation of policies and processes designed to address modern slavery risks in our operation and supply chains, as described throughout this Statement, as well as the day-to-day management of modern slavery risk. The RBWG comprises members of the Corrs Chambers Westgarth partnership, senior managers and the Chief Executive Officer 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 RBWG, 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, communications and technology teams.

## Approval

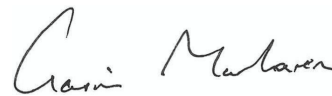
Corrs makes this Modern Slavery Statement in accordance with section 14 of the *Modern Slavery Act 2018* (Cth) and constitutes Corrs' modern slavery statement for the financial year ended 30 June 2023.

This Statement has been approved by the Board of Corrs Support Services on Tuesday 5 December 2023 and the Board of Corrs Chambers Westgarth on Friday 8 December 2023.



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

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