

Sharp & Carter

Modern Slavery Statement



Our Commitment

At Sharp & Carter our purpose is to be a catalyst for a new era of work — where organisations unlock potential through prioritising people above all else. We do not tolerate, support or engage in acts of modern slavery or human trafficking occurring within our business or supply chain.

We believe organisations thrive when their people are put first, and that a commitment to culture and respect must underpin every action.

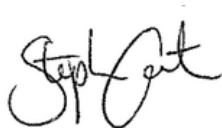
We expect our people, our suppliers, and their employees whether permanent or temporary, to be treated with dignity and respect at work.

At Sharp & Carter, we believe employment should always be chosen; there must be no forced, bonded, or involuntary labour. Employees must not be required to lodge monies or identity papers to be able to work and must be free to choose to leave employment.

We are dedicated to driving meaningful change, not only within our own business, but in the way we contribute to society more broadly. Our commitment to well-being and growth extends to everyone connected to our business, and we hold ourselves and our partners to that same standard.

This statement has been prepared by Sharp & Carter to meet the requirements of the Modern Slavery Act 2018 (Cth).

It covers the period 1 July 2025 to 30 June 2026 and explains the work we have undertaken to address modern slavery risks within our business.



Stephen Carter
National Partner
Sharp & Carter



Background

Modern slavery is a term to describe serious exploitation where individuals are coerced, deceived, or forced into situations they cannot freely leave.

In the Australian context, modern slavery can occur across a range of industries and supply chains. Vulnerable groups, including migrant workers, people seeking asylum, and those experiencing financial hardship are disproportionately at risk of exploitation. For businesses like Sharp & Carter, operating at the intersection of employment and professional opportunity, vigilance against modern slavery is not only a legal obligation used but a reflection of our core belief that every person deserves the right to work with dignity, choice, and respect.



Introduction

This statement is made pursuant to obligation under the Modern Slavery Act 2018 (the Act), for the financial year ending 30 June 2026 (Reporting Period)

This Modern Slavery Statement (Statement) has been prepared by Sharp & Carter Pty Ltd ABN 60 939 579 224 as the trustee for The Sharp & Carter Unit Trust which is the parent company for various Sharp & Carter registered businesses (see page 6).

Sharp & Carter's reporting entity's registered office is located at Level 3, Suite 3, 2 Nexus Court, MULGRAVE VIC 3170.

This Statement describes the risks of modern slavery in our operations and supply chains, the actions we have taken to assess and address those risks in the Reporting Period, and how we seek to assess the effectiveness of our actions moving forward.

In this Statement, where we use the term "modern slavery risks", we refer to the risk of harm to people arising from situations of exploitation such as forced labour, human trafficking, debt bondage, slavery and slavery-like practices (including the worst forms of child labour).

Sharp & Carter's Commitments

Zero Tolerance

Maintaining a zero-tolerance approach to modern slavery and exploitation. This includes zero tolerance for forced labour, debt bondage, servitude, human trafficking, and deceptive recruiting.

Ethical Practices

Ensuring all recruitment consulting practices are conducted ethically, legally, and in line with Australian employment legislation, including the accurate interpretation and application of award pay rates and classifications.

Client Suitability

Partnering with organisations that align with our professional standards and values, and that provide safe, compliant, and respectful workplaces for candidates and employees

Supplier Accountability

Holding suppliers to high standards of ethical conduct and compliance with modern slavery laws.

Transparency

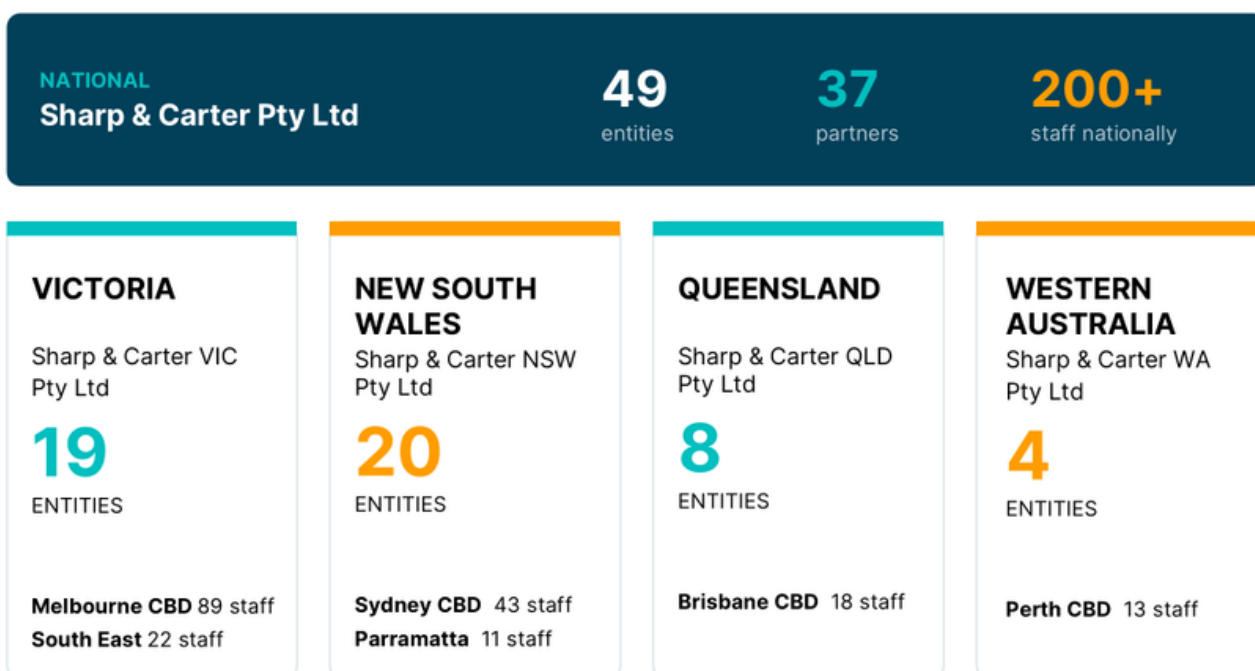
Promoting transparency in our operations and supply chain to prevent modern slavery.

Our Structure and Operations



Sharp & Carter is a privately owned Australian recruitment agency with over 15 years of experience supporting clients across both the public and private sectors. Founded in Melbourne, we have grown to a team of more than 200 internal staff ~80% consulting and ~20% Operations/Back Office operating nationally from six offices: Melbourne CBD, Melbourne South East, Sydney CBD, Western Sydney, Brisbane CBD, and Perth.

Entity Structure



Organisational Chart (July 2026)



Our Services

We specialise in white-collar recruitment, with strong expertise across Corporate, IT, Finance & Accounting, Business Support, Legal & Compliance, Human Resources, Sales, Marketing & Digital, Supply Chain & Operations, Engineering & Technical, and Clinical Healthcare.

Our services include:

Permanent recruitment

Fixed Term recruitment

Temporary recruitment

Volume recruitment

Contract recruitment

Executive Search & Selection

**Project & Consulting recruitment
solutions**

Our long-standing success is built on deep specialist knowledge, a partnership model that prioritises long-term relationships, and a strong national presence that enables us to deliver consistent service across Australia.



Modern Slavery Risks & Actions Taken to Address Them

SUPPLIERS

Sharp & Carter understands that, through our relationships with suppliers, there are inherent risks that may contribute to modern slavery practices across the broader supply chain. We are committed to working only with organisations that operate ethically, legally, and professionally.

As part of our due diligence process, we assess our supply chain partners and request a copy of their Modern Slavery Statement or Policy to ensure alignment with our ethical standards and expectations across the supply chain.

Our exposure to modern slavery risk is elevated by the known vulnerabilities associated with the industries for and from which we source, particularly in the following areas:

Suppliers to Sharp & Carter that have their own Registered Modern Slavery Statement in place provide the following support:

- Catering and hospitality
- Technology and Data
 - Recruitment CRM and Applicant Tracking System (ATS)
 - Electronics and hardware
 - Finance, HR & IT Systems
- Legal Advice
- Stationery & Office Supplies
- Property Management who in turn provide Building & Office Cleaning & Maintenance

Suppliers to Sharp & Carter that have a clearly outlined Modern Slavery Policy and Ethics Statement and have a clear understanding of Sharp & Carter's zero tolerance and commitment to Modern Slavery include the following:

- Printing, marketing materials, merchandise & corporate apparel



Modern Slavery Risks & Actions Taken to Address Them

RECRUITMENT-SPECIFIC RISKS

As a provider of recruitment consulting solutions and temporary and casual labour hire services, Sharp & Carter recognises that our operations place us at the intersection of key modern slavery risks identified under the Modern Slavery Act 2018 (Cth).

The recruitment and labour hire sector carries an elevated inherent risk profile, particularly in relation to deceptive recruiting, worker exploitation, and wage non-compliance. At Sharp & Carter we take these risks seriously and have implemented a suite of policies, procedures, and oversight mechanisms designed to ensure that every worker we engage is treated with transparency, fairness, and dignity, and that our operations meet or exceed all applicable Australian legal obligations.

Avoidance of Deceptive Recruiting

- All candidates are provided with a clear and accurate position description/description of duties prior to placement, detailing the client, nature of the role, working conditions, hours, and location.
- Pay rates are transparently communicated to candidates before engagement, with no ambiguity around remuneration expectations.
- We do not under any circumstances charge recruitment fees to candidates or workers at any stage of the recruitment process.

Contractual Transparency

- All temporary and casual employees are engaged under compliant written employment contracts prior to commencing work.
- Contracts clearly set out entitlements, pay rates, award coverage, and conditions of employment in plain language.
- All clients enter into a Recruitment Services Agreement with Sharp & Carter, setting out clear client-facing expectations including providing a safe and compliant workplace for placed workers, cooperating with our right-to-work and compliance checks, adhering to our Client Code of Conduct, and promptly notifying us of any concerns about worker treatment.

Subcontractor and Third-Party Payroll Arrangements

- Where candidates identified by Sharp & Carter are engaged through third-party payroll providers or subcontractor arrangements, we require those parties to demonstrate compliance with the Modern Slavery Act 2018 (Cth) prior to and as a condition of engagement.
- All third-party payroll providers and subcontractors engaged in the placement or payment of workers we identify are required to hold a current Modern Slavery Statement, or to provide equivalent evidence of their commitment to identifying and addressing modern slavery risks in their operations.
- We do not knowingly engage or refer candidates to payroll providers or subcontractors who cannot demonstrate modern slavery compliance, and we reserve the right to terminate arrangements where a provider fails to meet these standards.
- Third-party payroll arrangements are reviewed periodically to ensure ongoing compliance, and any concerns identified are escalated through our internal reporting process.

Pay Compliance & Audit

- We conduct fortnightly audits of all pay rates across our temporary and casual workforce to verify compliance with applicable Modern Awards and the National Employment Standards.
- Any identified discrepancy is escalated and remediated promptly, with records maintained for accountability.
- We do not permit host employers to apply pay rates below the applicable Award minimum.

Work Rights & Candidate Screening for right to work in Australia

- All candidates undergo right-to-work verification prior to placement, including visa entitlement checks where applicable.
- We maintain records of work rights documentation for all placed workers and monitor visa expiry where relevant.



Health, Safety & Compliance Training

- All temporary and casual employees receive health and safety and compliance training prior to or upon commencing placement.
- Training covers workplace rights, appropriate workplace behaviours, safety obligations, and how to raise concerns.
- Our Clients workplaces are assessed for suitability prior to placement by complying with required health, safety and psychosocial wellbeing standards.
- Sharp & Carter provide access to an Employee Assistance Program (EAP) to all of our permanent, temporary and contract employees. This includes confidential counselling, mental health support, and referral services at no cost to the employee, regardless of the length or nature of their engagement.
- Access to the EAP is communicated to all placed workers at the commencement of their engagement and is available throughout the duration of their employment with Sharp & Carter.

Grievance & Escalation Mechanisms

- Clear escalation pathways and procedures are provided to all Sharp & Carter permanent, fixed term and casual employees, enabling them to report concerns about their working conditions, pay, or treatment without fear of reprisal.
- All Sharp & Carter employees have access to clear escalation channels to raise a grievance, alternatively we have confidential Whistleblower reporting channel which enables anonymous reporting of concerns, including but not limited to suspected modern slavery.
- All employees are informed of their right to contact the Fair Work Ombudsman and other relevant authorities.
- Our consultants are trained to identify indicators of worker exploitation and are required to escalate any concerns through our internal reporting process.





Client and Host Employer Due Diligence

- As a recruitment business operating predominantly in the corporate sector, Sharp & Carter benefit from an inherently lower-risk client base; approximately 70% of our clients have their own Modern Slavery Statement in place, providing transparency around their operations, supply chains, and commitment to ethical labour practices.
- For clients who do not yet meet the reporting threshold or who have not produced a Modern Slavery Statement, we require demonstrated commitment to modern slavery policies and practices as a condition of engagement, in accordance with our Supplier Code of Conduct.
- Our Supplier Code of Conduct sets out minimum expectations around ethical employment, worker rights, and modern slavery compliance, and forms part of our standard client engagement process.
- This approach ensures that regardless of a client's size or reporting obligations, all host employers engaging workers through us are held to a consistent standard of modern slavery awareness and commitment.

Labour Hire Licensing Compliance

- Sharp & Carter hold current labour hire licences or equivalent registrations in Victoria, Queensland, and Western Australia, demonstrating our commitment to transparent, regulated, and ethical labour hire practices in the jurisdictions in which we operate.
- Sharp & Carter welcome and support the development of a single national labour hire licensing framework, which will consolidate the existing state and territory schemes into a consistent set of obligations applying across all Australian jurisdictions.

Ongoing Oversight

- We maintain regular contact with placed temporary and contract employees throughout their engagement to monitor wellbeing and working conditions.
- Client relationships are subject to ongoing review, and we reserve the right to withdraw placements from host employers where concerns about worker treatment cannot be resolved.
- We are monitoring the development of the proposed national labour hire licensing framework and are committed to full compliance upon its introduction.

Equal Opportunity, Non-Discrimination and Workplace Conduct

- Sharp & Carter are committed to providing a workplace free from discrimination, victimisation, and harassment, and maintain clear policies and procedures that prohibit any such conduct on all grounds prescribed under Commonwealth, state, and territory legislation; including marital status, pregnancy, family responsibilities, sex (including gender reassignment), race (including colour, ethnic and national origin, and nationality), disability, sexual orientation, religious belief, age, trade union activity, and any other ground protected by applicable law.
- All workers, placed candidates, and client contacts are provided with information on appropriate workplace conduct standards and our expectations for respectful and inclusive behaviour at the commencement of and throughout any engagement with Sharp & Carter.
- Sharp & Carter maintain accessible and confidential grievance procedures that enable any worker, candidate, or employee to raise a concern about discrimination, harassment, or victimisation without fear of reprisal and all grievances are investigated promptly, impartially, and in accordance with our formal complaints process.
- Our recruitment practices are built on the principle of merit-based selection — we assess all candidates solely on their skills, experience, qualifications, and suitability for the role, and we do not discriminate on any prescribed ground at any stage of the recruitment process, including in the advertising of roles, shortlisting, interviewing, or placement decisions.
- We actively work to identify and remove unconscious bias from our recruitment processes, including through structured interviewing practices and consistent assessment criteria applied equally to all candidates.



REMEDATION

Where Sharp & Carter identifies, or is made aware of, an actual or suspected instance of modern slavery, exploitation, or non-compliant treatment of a worker within our operations or supply chain, we are committed to taking prompt and appropriate remedial action.

Our remediation approach

- Any confirmed instance is escalated immediately through our internal reporting process to senior leadership. Affected workers are supported directly, including access to our Employee Assistance Program, and connected with relevant external support services and government authorities such as the Fair Work Ombudsman where appropriate.

Supplier and host employer response

- Where a supplier, subcontractor, third-party payroll provider, or host employer is found responsible for a breach, Sharp & Carter will require immediate corrective action and reserves the right to suspend or terminate the engagement where concerns cannot be resolved.

Cooperation and reporting

- Sharp & Carter will cooperate fully with relevant authorities in any investigation and maintain records of remediation actions taken, to support ongoing monitoring and continuous improvement of our modern slavery risk management framework.



Assessing the Effectiveness of Our Actions To Date

This is the first Modern Slavery Statement submitted by Sharp & Carter. An in depth review of our current practices has supported the following findings:

0

instances of identified forced labour, deceptive recruiting, or modern slavery in Sharp & Carter operations during the reporting period.

Suppliers

to Sharp & Carter hold a current Modern Slavery Statement, Modern Slavery Policy or equivalent.

100%

of placed employees are engaged under a compliant written employment contract.

Fortnightly

pay audits completed, with all discrepancies identified and remediated within 14 business days.

All

third-party payroll providers and active subcontractors hold a current Modern Slavery Statement or equivalent.

100%

of candidates go through right-to-work verification prior to placement.

69%

of our clients in this reporting period were confirmed as holding a current Modern Slavery Statement lodged with the Australian Government's Modern Slavery Statements Register, demonstrating a documented and transparent commitment to identifying and addressing modern slavery risks within their own operations and supply chains.



Future Actions and Commitments

During the next reporting period, Sharp & Carter are committed to the following actions to further strengthen our modern slavery risk management framework:

Supplier Code of Conduct

Finalise, execute, and distribute our Supplier Code of Conduct to all active third-party payroll providers, subcontractors, and relevant supply chain partners, and incorporate acceptance of the Code as a mandatory condition of new and renewed supplier engagements.

Client Terms of Business

Embed our Modern Slavery and Ethical Compliance clause into our standard Terms of Business across all new client engagements, and progressively roll out to existing clients at the next contract renewal point.

Client Modern Slavery Questionnaire

Develop and deploy a standardised Client Modern Slavery Questionnaire to assess and document the modern slavery compliance posture of all suppliers not yet holding a current Modern Slavery Statement.

Labour Hire Licensing

Obtain any additional labour hire licences required as a result of the expanded South Australian scheme and monitor the progress of the proposed Australian National licensing framework, preparing for compliance ahead of any commencement date

Consultant Training

Implement formal modern slavery awareness training for all recruitment consultants and client-facing staff, with completion recorded and refreshed annually

External Whistleblowing Option

Investigate the appropriateness and cost-feasibility of an external whistleblowing service offering both phone and email reporting channels, suitable for a 200-person organisation. Initially available to Sharp & Carter employees, with a view to extending access to clients and suppliers.

EAP Awareness

Implement a structured communication process to ensure all temporary and contract workers are actively informed of their access to our Employee Assistance Program at placement commencement and at regular intervals throughout their engagement

Modern Slavery Risk Register

Develop a formal modern slavery risk register documenting identified risks, likelihood, impact, and mitigation status, to provide a structured framework for ongoing monitoring and annual review

Statement Register Submission

Ensure this Statement is submitted to the Australian Government's Modern Slavery Statements Register within the required timeframe and is made publicly available on our Sharp & Carter website

Consultation Statement

Sharp & Carter Pty Ltd operates through 49 entities across four States (Victoria, New South Wales, Queensland, and Western Australia). In preparing this Statement, Sharp & Carter consulted with the Partners and People & Culture leads responsible for each of these entities to ensure the risks, actions, and commitments described accurately reflect practices across the group.

Consultation was supported by Sharp & Carter's centralised operating model, under which finance, human resources, payroll, compliance, information technology, marketing, contract and commercial functions are managed nationally on behalf of all entities within the group. This structure ensures consistent policies, processes, and standards of worker treatment are applied uniformly across every state Unit Trust, regardless of entity or location.

Governance and Approval

This Statement was approved by the Partners of Sharp & Carter Pty Ltd, acting in their capacity as the principal governing body of the reporting entities, on 1 September 2026.

In accordance with section 14 of the Modern Slavery Act 2018 (Cth), this Statement is signed below by a responsible member of Sharp & Carter.



A handwritten signature in black ink, appearing to read 'Stephen Carter'.

Stephen Carter

National Partner, Sharp & Carter

Signed on behalf of the principal governing body.

Contact Us

LOCATIONS

Melbourne
South-East Melbourne
North Sydney
Parramatta
Brisbane
Perth

ASK US ANYTHING

graduates@sharpandcarter.com.au
Melbourne: +61 39616 2600
Sydney: +61 28315 8800
Brisbane: +61 73018 3840
Perth: +61 86263 9340

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