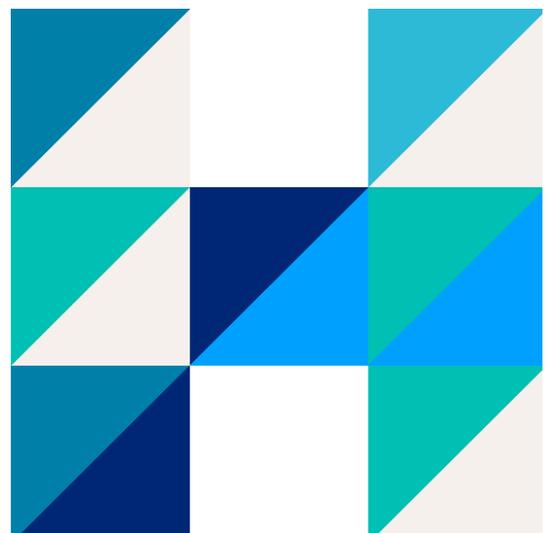


HAYS AUSTRALIA POLICY FOR THE PREVENTION OF & REPORTING ON MODERN SLAVERY

STATEMENT FOR 2022 - 2023 REPORTING YEAR



Introduction

Hays Specialist Recruitment (Australia) Pty Limited ABN 47 001 407 281, registered office Level 13 Chifley Tower, 2 Chifley Square, Sydney, NSW, 2000 ('Hays'), Australia's leading specialist recruitment and agency worker/labour hire company, recognises that all businesses have an obligation to prevent slavery, slavery-like practices and human trafficking and will do all in its respective power to prevent slavery, slavery-like practices and human trafficking within its business and within the supply chains through which it operates.

This statement addresses Hays' obligations and compliance in relation to the 'Modern Slavery Act 2018 (Cth)' and the 'Modern Slavery Act (2018) (NSW)' (together, 'the Act') and highlights the steps we take to ensure there is no slavery or human trafficking occurring within the organisation or its supply chains. One of our company's most valuable assets has always been its reputation for integrity and fairness. Maintaining this reputation within our market is an essential pre-requisite to our continued success.

Hays acknowledges that it is required to submit its modern slavery statement within 6 months from the end of each reporting period.

Hays' structure & operations

Hays is an Australian large proprietary company that is a wholly owned subsidiary of Hays plc, a UK company listed on the London Stock Exchange. Hays plc is subject to the UK's 'Modern Slavery Act 2015' which covers its subsidiaries, and it produces a statement in relation to the requirements of the UK legislation on behalf of Hays plc and its subsidiary companies and is signed by its Chief Executive and is available on the Hays UK website.

Hays is the leading specialist recruiting company and is an expert at recruiting qualified, professional and skilled people, being the market leader in Australia. Hays operates across the private and public sectors, dealing in permanent positions, contract roles and temporary assignments.

Hays Australia is also the registered branch of Hays' operations in New Zealand, and as at 30 June 2023, Hays Australia employed over 1,600 direct staff operating in 43 offices in each State and Territory of Australia and in New Zealand. For the 2022-23 financial year Hays in Australia placed around 13,500 people into permanent jobs, and also filled over 66,000 temporary jobs, paying an average of 15,000 temporary workers each week.

Our recruitment services can be broadly categorised as follows:

- Permanent recruitment
- Outsourced permanent recruitment
- Executive search and selection
- Temporary recruitment
- Contingent recruitment solutions
- Volume hiring
- Globalink recruitment services
- Sustainability recruitment

We provide our recruitment and job agency/labour hire services in the following areas: Accountancy & Finance; Architecture; Banking; Construction; Contact Centres; Education; Energy; Engineering; Executive; Facilities Management; Healthcare; Human Resources; Insurance; Technology; Life Sciences; Logistics; Manufacturing & Operations; Marketing & Digital; Office Support; Oil & Gas; Policy & Strategy; Procurement; Property; Resources & Mining; Response Management; Retail; Sales and Trades & Labour.

We also provide advisory services in the following areas:

- Assessment and development services
- Salary benchmarking
- Career transition services
- Technology advisory and implementation

Modern slavery can take many forms including the trafficking of people, forced labour, child labour, servitude and slavery. As Australia's leading recruitment experts, we take our responsibility for supplying staff extremely seriously and are aware of the potential for being targeted by traffickers and unlicensed labour hire providers, in local jurisdictions where licensing is a requirement. Our own processes around candidate engagement ensure our employees are alert to the signs of exploitation, so that we may take the necessary action promptly and effectively should it be identified. Sectors affected include, but are not limited to, construction & property, engineering & manufacturing and health & social care.

Hays' supply chains & risks of modern slavery

Recruitment & agency worker/labour hire supply

Our supply chains include sourcing candidates for our clients. This may involve the introduction by external agencies to Hays of candidates for onward supply to our clients, or the direct introduction of candidates to our clients by Hays.

With regard to labour hire specifically, the final report of the Migrant Workers' Taskforce handed down in March 2019 identified four high risk sectors which were horticulture, meat processing, cleaning and security. In addition, Victoria under its labour hire licensing scheme identifies poultry processing as a high-risk sector, and South Australia under its labour hire licensing scheme identifies trolley collection and seafood processing as high-risk sectors.

Hays is licensed as required under the various state and territory licensing schemes. Of the high-risk sectors, Hays only supplies limited workers in the cleaning industry, and limited workers on a sporadic basis in the security industry, meat processing industry and horticulture industry in certain states.

Suppliers to Hays

We contract with third parties who provide services to assist with the everyday running of our business, such as IT service providers and property management companies (who, for example, may provide cleaning services to our offices) as well as companies who provide office supplies to our office network.

We acknowledge that by virtue of contracting with other parties, whether as a client or as a supplier, there is always some risk that may contribute to modern slavery practices. We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally compliant and professional manner by adhering to the Hays Supplier Code of Conduct. We also expect our suppliers to promote similar standards in their own supply chain.

Actions taken to assess & address modern slavery risks

Candidate engagement

Hays ensures that strict compliance checks are carried out for all candidates it supplies. We verify the identity of each worker and their right to work before supply commences. We also have a dedicated temporary worker payroll team who audit the relevant modern award or enterprise agreement that a temporary worker is engaged under to ensure they are paid correctly in accordance with the relevant award or agreement.

As part of our commitment to identify and eradicate slavery and human trafficking and to continuously assess and address modern slavery risks, we have in place a process to undertake due diligence on our supply chain network to ensure compliance with legislative obligations, and such compliance forms part of our contractual relationship with suppliers. We will use best endeavours to procure from our suppliers by contract that full compliance with the Act must be achieved. We will use best endeavours to separately require that any actual or potential risk of breaching the Act that suppliers identify in their own operations or supply chains are communicated to us. This information will be assessed and evaluated appropriately by senior members of Hays management on an ongoing basis.

Supplier Code of Conduct

Hays regularly reviews and updates its Supplier Code of Conduct, which is a document that is relevant to all suppliers to Hays. Suppliers are expected to adhere to the Hays Supplier Code of Conduct, which includes specific reference to various matters including human rights, anti-bribery and corruption, and modern slavery and human trafficking, and suppliers should have in place a policy recognising, respecting and protecting the human rights of their employees, those of their suppliers and business partners and the communities affected by the suppliers' operations.

Hays' position, which is mirrored in its Supplier Code of Conduct, is that:

- Employees should be free to choose to work for their employer and to leave the company upon reasonable notice
- All employees must be provided with a clear contract of employment, which complies with local legislation
- All employees must be treated in a fair and equal manner and with dignity and respect
- Any form of discrimination, victimisation or harassment on any prescribed grounds under commonwealth, state or territory laws should be prohibited. This includes marital status, pregnancy, family responsibilities, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, religious belief, age, trade union activity or any other prescribed ground
- All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to in all countries of operation, without any unauthorised deductions
- All slavery and human trafficking laws must be complied with including, but not limited to, the provisions of the Act and any applicable state legislation. Suppliers must ensure their business operations are free from slavery and human trafficking practices whether in Australia or elsewhere, both internally and within their supply chains and other external business relationships

Cooperation with client due diligence

Our clients in the private sector operate in many industries and range in size from small businesses through to local subsidiaries of global groups. We also work closely with government departments and agencies across all jurisdictions. That being the case, Hays is familiar with participating in clients' audits of their respective supply chains. In doing so, Hays is also able to observe its clients' own practices on the prevention of modern slavery.

Engagement with suppliers

During the reporting period Hays engaged with various companies that provide services to Hays' office network. This involved providing copies of Hays' Supplier Code of Conduct to these suppliers and enquiring as to the modern slavery compliance practices and procedures. As part of its standard onboarding process, Hays issues RFI documentation to prospective suppliers so that the prevention of modern slavery is specifically addressed as part of Hays' due diligence prior to contracting with a supplier.

Reviewing contractual documentation

Hays' standard form client contract includes specific references to modern slavery law compliance. We will continue to review and update those terms whenever required and otherwise whenever appropriate.

Ability for employees to raise concerns at work

All Hays employees have access to dedicated channels through which they may voice concerns, either through local reporting mechanisms or through whistleblowing procedures. Hays is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in compliance with whistleblowing procedures will be treated confidentially and without fear of retaliation. It is by receiving and evaluating feedback and maintaining a culture of compliance that Hays can assess the effectiveness of its practices and procedures.

Training

All staff within Hays are expected to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty. We have undertaken to review our policies and procedures to ensure our colleagues have access to any additional information and support they may require with regard to human trafficking, forced labour, child labour, servitude and slavery. All relevant employees in Australia will undertake training on modern slavery and human trafficking and this training is available to all employees to undertake.

Assessing the effectiveness of the actions taken

Our assessment of the effectiveness of the tasks set out in our 2021-22 statement is as follows.

‘Working for your tomorrow’

Hays’ rebrand and repositioning launched globally on 1 July 2022 in direct response to the changes observed in our industry and how we have been supporting our customers following what have been fundamental changes to the world of work. The new branding, ‘Working for your tomorrow’, was created to put people, whether clients or candidates, at the core of what we do, and our continued aim is to prepare organisations and people to be better tomorrow than they are today. The Act and its global equivalents are therefore of key consideration.

As contemplated in our last statement, the language used in the new branding is intended to speak directly to our people and indicates how we work collaboratively to enable the goals and ambitions of all parties. Our view is that the branding is consistent with the principles of how we operate, including one of our key values to ‘Do The Right Thing.’

Our consultants’ success stories are regularly shared in formal and informal communications within the organisation, and it is with great pride that we support candidates to create a better tomorrow for themselves and their families.

Changes in the local company group

In our last statement, we considered whether a consequence of changes to our local company group and structure was that separate reporting obligations would be appropriate.

We acknowledge that even if reporting is not strictly mandatory in respect of other entities, optional disclosure would be consistent with our values and continued commitment to achieving the principles of the Act. That said, our evaluation at the time of writing is that the current size of those businesses would not necessitate the producing of a separate statement and the operations of those business would be captured by the scope of this statement in any event.

Implementing compliance with the Act

In our last statement, we considered whether the carriage of matters relating to compliance with the Act should move from Hays’ internal Legal team to another team. At the time of writing, a decision has been made for Hays’ Legal team to retain this responsibility and that more team members will be briefed to participate.

In addition to the above, Hays achieved the following to support employee wellness:

Our new EAP was launched

The service provides support and counselling to employees who are facing personal or work-related challenges and includes support to help employees cope with stress, anxiety, depression, trauma, addiction, family issues, financial problems, and more. Specifically, the platform provides mental health counselling and support on demand at any time day or night and offers emergency support, medical health advice and triage through a panel of registered nurses, wellbeing experts, psychologists and in-person responders.

By offering confidential and professional support and counselling, our EAP is there to help our people overcome personal and work-related challenges, and to especially empower members of vulnerable communities to safeguard their freedom and dignity. Our continued aim is that the EAP will help our people develop resilience, coping skills, and self-esteem that can go some way toward reducing their vulnerability to modern slavery and enhance their well-being and productivity.

Commitment to continued practices:

In addition to the above, Hays continued to:

- Require potential suppliers to formally disclose their modern slavery risk mitigation strategies as part of Hays' RFI process
- Regularly review our standard form contracts and actioning updates when and if required
- Hold an annual review process with members of senior management

Looking forward

Having now completed several reports, and having assessed the effectiveness of the steps taken by our business to prevent modern slavery practices occurring at Hays and any prevalence of this within Hays' supply chain, Hays intends on taking the following steps over the next 12 months:

To support employee learning and development

We plan to investigate whether the following would benefit our people:

- We will explore whether subscription platforms could offer our people the opportunity to increase their knowledge of focused topics at their own pace. Subject to the content available on the platform that is ultimately chosen, we will consider whether there is merit in making a module relating to the Act compulsory
- Separately, Hays' internal Legal team will continue to provide guidance to the Commercial, Tenders and other Operational teams regarding the extent of and continued compliance with the Act

To increase opportunities for employees to raise concerns and for risks to be identified

We will evaluate whether the following would be effective:

- Our Executive Leadership Team is currently discussing whether the creation of a targeted Risk Committee is appropriate. The goal of the Risk Committee would be to provide a platform for senior staff members to identify and discuss actual and potential risks presented to our business, including matters relating to employee wellness. We expect that some matters addressed by the Risk Committee may, where appropriate, appear in future statements
- Related companies in Hays' group that provide business enablement services to support Hays' operations employ people in jurisdictions outside of Australia, and we consider that it would be appropriate and prudent to conduct an audit of those companies to establish that they are and continue to be compliant with the Act

Continued practices

We will continue to regularly undertake, and review the effectiveness, of our now-standard processes regarding compliance with the Act, being to:

- Assess whether it is appropriate to conduct a targeted audit of Hays' suppliers
- Require potential suppliers to formally disclose their modern slavery risk mitigation strategies as part of Hays' RFI process
- Increase the number of Hays employees who are provided with dedicated training on modern slavery laws
- Regularly review our standard form contracts and actioning updates when and if required
- Hold an annual review process with members of senior management

This statement is made pursuant to the Act and constitutes Hays' slavery and human trafficking statement in respect of the 2022-23 reporting year and is approved by the principal governing body of Hays, being its board of directors.



Signed:

Matthew Dickason
CEO, Asia Pacific

Hays Specialist Recruitment (Australia) Pty Limited