

# ROBERT WALTERS

## MODERN SLAVERY STATEMENT

### POLICY STATEMENT

This Modern Slavery Statement (**Statement**) has been prepared by Robert Walters Pty Ltd ACN 079 521 618 (**Robert Walters**) in accordance with the provisions of the Modern Slavery Act 2018 (Cth) (**the Act**). This Statement covers Robert Walters' operations during the calendar year of 2020 (**Reporting Period**).

### OUR STRUCTURE

Robert Walters is a specialist professional recruitment consultancy. We match highly skilled professionals to permanent, contract and interim roles across the disciplines of accountancy and finance, banking, engineering, HR, IT, legal, sales, marketing, secretarial and support and supply chain, logistics and procurement.

Robert Walters, headquartered in Melbourne, was established in 1997. Our registered office is at 385 Bourke Street, Melbourne VIC 3000 Australia.

As at 31 December 2020, Robert Walters had a total of 226 internal employees.

Robert Walters is a limited company incorporated in Australia. Robert Walters' parent company and ultimate holding company is Robert Walters plc, a public company limited by shares, incorporated and domiciled in the United Kingdom. Robert Walters controls two other entities: Robert Walters (Australia) Pty Ltd (**Robert Walters (Australia)**) and Resource Solutions Corporation Pty Ltd (**Resource Solutions**).

Robert Walters has six offices across Australia: Melbourne, Sydney, Chatswood, Adelaide, Brisbane and Perth.

Robert Walters' supply chains include suppliers from the following sectors: Accommodation, Cleaning, Logistics, Medical Information Technology, Office Supplies and Equipment, Security, Education, Utilities, Property Services, Food and Beverage, Events, Marketing, Travel, Print and Promotional Goods and Services. Most of our suppliers are located in Australia.

The operations and supply chains of Robert Walters' controlled entities are described below:

ENTITY	OPERATIONS	SUPPLY CHAIN
<b>Resource Solutions</b>	Resource Solutions is a provider of Recruitment Process Outsourcing and Managed Service Provider solutions. As at 31 December 2020, Resource Solutions had a total of 6 internal employees.	Resource Solutions contracts with suppliers in the following industries: <ul style="list-style-type: none"><li>■ Information Technology;</li><li>■ Food and Beverage;</li><li>■ Marketing and Advertising;</li><li>■ Communications;</li><li>■ Labour hire, recruitment and executive search;</li><li>■ Property.</li></ul>
<b>Robert Walters (Australia)</b>	Robert Walters (Australia) is a dormant entity controlled by Robert Walters. Robert Walters (Australia) is not carrying out any business activities in Australia.	No suppliers.

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### RISKS OF MODERN SLAVERY PRACTICES

#### Potential to Cause – Recruitment and Labour Hire Services

Robert Walters considers that it has a low potential to cause modern slavery risks through its service offering. Robert Walters' core business is the supply of labour hire, payrolling and recruitment services in respect of white-collar roles in various industries. It also provides immigration services.

Where labour hire and payrolling services are provided, Robert Walters employs or engages candidates directly who are then on-hired to our clients to perform temporary roles. We provide all candidates with an employment or engagement agreement (as applicable) written in English. We do not charge candidates fees for the employment or placement services we provide. We do not store original sensitive and personal documents of candidates we employ, engage, or introduce to clients.

Robert Walters' candidates include migrant workers who hold temporary working rights in Australia. Before a candidate with temporary working rights commences any type of employment or engagement, Robert Walters conducts right to work checks to ensure the person is a lawful resident of Australia and has valid working rights.

#### Licensing

Robert Walters is firmly committed to complying with all applicable laws in its provision of services. During the Reporting Period, we held labour hire licences and employment agent licences in all States where laws required us to have a licence.

The objectives of the State labour hire licensing schemes are, broadly, to protect workers from exploitation by labour hire providers and their clients, to improve the transparency and integrity of the labour hire industry, and to promote responsible practices in the industry. It is a condition of holding such licenses that Robert Walters meets strict 'fit & proper person' and compliance tests and submits regular reports to the relevant licensing authorities. Such reports require us to provide substantial information regarding the number of candidates on our payroll, a breakdown of candidate visa types, confirmation that we do not charge candidates for services and details of any breaches of the Fair Work Act 2009 (Cth).

#### RCSA

In addition, Robert Walters is a member of the Recruitment, Consulting and Staffing Association (**RCSA**). As an RCSA corporate member, Robert Walters is bound by the RCSA Code of Professional Conduct. Under the RCSA Code of Professional Conduct, members are accountable to RCSA for meeting certain standards of professional conduct, including the requirements to protect candidates from exploitation (including forms of modern slavery); conduct business in a way that avoids causing or contributing to exploitation through their activities; and seek to prevent or mitigate risks of exploitation that are linked to their operations or services by their business relationships, even if they have not contributed to those risks. RCSA corporate members are responsible for ensuring that their staff meet the standard of professional conduct required by the RCSA Code of Professional Conduct.

#### Potential to Contribute – Indirectly

We understand that recruitment agencies in general may potentially contribute to modern slavery practices by supplying and introducing candidates to companies operating in high-risk sectors or countries.

The *Modern Slavery Risks, Rights & Responsibilities* report<sup>1</sup>, commissioned by the Australian Council of Superannuation Investors and prepared by KPMG, identified six high-risk sectors: financial services, property, food and beverage, agriculture, mining, and health care. State labour hire licensing schemes also consider the following industries to represent a higher risk: trolley work, horticulture, meat processing and seafood processing, fishing, and cleaning.

Of the high-risk sectors identified, those which Robert Walters provides services to are the financial services, property, and health care industries in Australia. In all cases, Robert Walters only supplies services for white collar roles.

To mitigate any risks of underpayment to or exploitation of our labour hire workforce, Robert Walters provides extensive training to its recruitment consultants on workplace laws and regulations. In addition, our internal finance and payroll systems are designed in a way that prevents recording candidate placements with a pay rate that is below the applicable minimum wage rate or the rate prescribed by the relevant modern award. These measures allow Robert Walters to educate and alert its clients about potential underpayments of candidates they are looking to engage for temporary roles.

#### Be Linked To – via Supply Chains

Robert Walters understands that by virtue of procuring goods or services from third parties it may be unintentionally linked to modern slavery.

Robert Walters is committed to engaging with trusted suppliers. Our supply chain includes suppliers from the following sectors: Accommodation, Cleaning, Logistics, Medical Information Technology, Office Supplies and Equipment, Security, Education, Utilities, Property Services, Food and Beverage, Events, Marketing, Travel, Print and Promotional Goods and Services.

The majority of our first-tier suppliers are based in Australia. We also have global agreements with large suppliers in the UK, USA and Singapore.

<sup>1</sup> KPMG, Modern Slavery Risks, Rights & Responsibilities (Report, February 2019)  
< <https://assets.kpmg/content/dam/kpmg/au/pdf/2019/modern-slavery-guide-for-companies-investors-feb-2019.pdf>>.

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### ACTIONS WE HAVE TAKEN

#### Modern Slavery Policy

Robert Walters drafted and published its Modern Slavery Policy in October 2020. Robert Walters has a zero-tolerance approach to any imposition of, or connection with, modern slavery and human trafficking. The policy reflects our commitment to acting ethically and with integrity in respect of our staff, business relationships and the community in general.

The policy can be found on our website or via the following link: <https://www.robertwalters.com.au/about-us/modern-slavery-policy.html>.

#### Contractual Obligations

Robert Walters has drafted a new clause to be inserted into supplier contracts that requires our suppliers to identify and mitigate modern slavery risks within our operations and supply chains. Our Legal team sought to insert the clause into new supplier agreements it reviewed during the Reporting Period.

#### Supplier Code of Conduct

During the Reporting Period, Robert Walters' Legal department commenced drafting of a Supplier Code of Conduct (**the Code**). Robert Walters expects to publish and distribute the Code in the next reporting period.

#### Initial Supplier Mapping

Robert Walters conducted an initial audit of its first-tier suppliers during the Reporting Period. We completed a high-level risk assessment of our first-tier suppliers based upon the sectors they are operating in, their location and the types of goods or services provided to Robert Walters. Many of Robert Walters' suppliers are long-term suppliers with whom Robert Walters has formed trusted relationships over years.

The auditing process allowed Robert Walters to identify suppliers operating in high-risk industries. This, in turn, assisted Robert Walters to map its approach on managing modern slavery risks within its operations and supply chains.

#### Internal Audits

Robert Walters maintains high principles in respect of human rights in its internal and external operations. Each year Robert Walters' internal HR and Payroll teams conduct salary and wage audits to ensure that each employee receives at least the minimum wage, applicable penalty rates and superannuation as required by law.

Robert Walters' internal systems are designed to prevent underpayment of its candidates and permanent staff.

#### Whistleblowing

Robert Walters has a Whistleblower Policy in place that allows eligible disclosers to report on a matter where there are reasonable grounds to suspect misconduct or an improper state of affairs in relation to Robert Walters, its employees, officers or any related body corporate. Disclosures may relate to violations of modern slavery laws. Eligible disclosers can make a disclosure in person, by phone or post, or anonymously.

The Whistleblower Policy can be found on our website or via the following link:

<https://www.robertwalters.com.au/about-us/robert-walters-whistleblower-policy.html>

#### Candidate Care

Robert Walters' recruitment consultants are committed to maintaining exceptional candidate care. We maintain close contact with all candidates placed in temporary and permanent roles. We strongly believe that regular catch ups with placed candidates can help us to identify unfair or unjust treatment of candidates by our clients. Depending on the type and tenure of a role, our recruitment consultants conduct candidate care calls and meetings with candidates who commence a new role during the first week, first month and then on a periodic basis.

Some of our offices have a dedicated candidate management team to ensure regular contact with candidates, even those in long tenure roles.

Our consultants receive extensive training on the type of questions to ask a candidate about their new role, volume of work, working hours and how the job meets the candidate's expectations.

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### EFFECTIVENESS

#### Number of Complaints

Robert Walters provides avenues for candidates and permanent staff to raise concerns about payments and working conditions. During the Reporting Period, Robert Walters did not receive any complaints from candidates or staff in relation to matters that could result in or contribute to the risks of modern slavery.

#### Regular Reviews of Internal Processes

Our business departments are constantly considering how they can improve Robert Walters' operations. We conduct regular reviews of our internal processes, databases and our policies that we share with staff and external stakeholders.

#### Internal Audits and Reviews

Our internal Payroll team conducts monthly reviews of processed payments to identify if candidates who are paid a fixed hourly rate are better off overall when compared to being paid in accordance with a modern award. During the Reporting Period, Robert Walters' Payroll Manager identified one instance where an on-hired candidate was underpaid because the person worked unscheduled overtime hours over a one-month period. The candidate was back paid the correct amount as soon as the underpayment was identified.

### CONSULTATION WITH CONTROLLED ENTITIES

Robert Walters worked in collaboration with Resource Solutions to identify suppliers in common. Resource Solutions is aware of Robert Walters' requirement to report under the Act and shared the list of its suppliers with Robert Walters. Robert Walters conducted a preliminary assessment of Resource Solutions' suppliers and did not identify any apparent risks of modern slavery in Resource Solutions' first-tier supply chain. Further, Robert Walters provides regular updates to Resource Solutions on changes to workplace laws that affect Robert Walters' operations and may potentially impact Resource Solutions' operations. Robert Walters also shared its updated compliant templates and best practices with managing its temporary and permanent workforce with Resource Solutions during the Reporting Period.

Robert Walters informed the Company Secretary of Robert Walters (Australia) of its obligation to report under the Act. The Company Secretary had an opportunity to provide information about operations and supply chains of Robert Walters (Australia).

### OTHER INFORMATION

#### Limitations

This year marks Robert Walters' first submission of its annual modern slavery statement in accordance with the Act. We are committed to building upon this first modern slavery statement in the coming years. This year's statement describes Robert Walters' initial response to the new modern slavery framework in Australia on which we expect to improve year-on-year.

#### COVID-19

Robert Walters acknowledges that COVID-19 can directly impact and contribute to the risks of modern slavery around the world. Anti-Slavery International reported that COVID-19 has created new risks of modern slavery, increased vulnerability to slavery due to mass layoffs and disrupted anti-slavery efforts<sup>2</sup>. Further, COVID-19 has worsened discrimination and increased risks for migrant workers.

Robert Walters realises that it has the ability to address and mitigate risks related to the overall wellbeing of our on-hired candidates and internal employees. Robert Walters' Health and Safety Manager implemented various initiatives during the Reporting Period that were aimed at helping our workforce to cope with the challenges and risks associated with COVID-19.

#### Webinars

The global pandemic pushed new and experienced professionals alike back into the job market at one of the most difficult periods in recent times. In response, Robert Walters developed various guides and tools to give its candidates and job seekers the advice needed to search for employment and to interview with confidence — no matter what stage of their career.

We launched a series of global e-guides and webinars dedicated to supporting the professional, personal and psychological needs of job seekers. Topics included strategies for coping with redundancy, maintaining productivity while working from home, looking after mental health and even training and reskilling yourself from home.

<sup>2</sup> Anti-Slavery International, *Covid-19 and slavery: the five big impacts* (Web Page)  
< <https://www.antislavery.org/covid-19-and-slavery-the-five-big-impacts/> >.

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### OTHER INFORMATION

#### Support and wellbeing

During the Reporting Period, Robert Walters' staff and direct family members had access to Robert Walters' corporate employee assistance services to support them through challenging times. Our on-hired candidates were also offered access to the employee assistance services on a referral basis.

Robert Walters communicated frequently with its on-hired candidates and provided regular COVID-19 updates relevant to the State or Territory where the candidate performed their role. Such information was directly obtained from the Australian and State Government Health Departments and Ministries.

#### Consultant training

Our consultants are trained to be vigilant for signs of poor health amongst our candidates introduced for temporary and permanent roles with our clients. During the Reporting Period, Robert Walters provided additional training and information to its consultants on how to identify any warning signs of distressed candidates and what steps they need to take to address the situation.

#### Further Improvement

Robert Walters will continue focusing on improving its anti-modern slavery practices. Our goal for the 2021 calendar year is to conduct further assessments of our first-tier suppliers. Robert Walters is committed to continually improving its initiatives in identifying and mitigating modern slavery risks in its operations and supply chains.

Robert Walters has established certain risk management goals it plans to achieve in the future. We have divided risk management goals into two categories: short-term goals and long-term goals.

Short-term goals are actions Robert Walters aims to undertake in the next reporting period. Long term goals describe actions Robert Walters intends to undertake within the next five (5) years to manage and mitigate risks of modern slavery.

Short term goals	Long term goals
<p><b>Internal training</b></p> <p>Robert Walters will implement training on how to identify modern slavery risks for staff who select and engage with suppliers.</p>	<p><b>Second-tier supplier assessment</b></p> <p>Robert Walters will implement training on how to identify Robert Walters will require its first-tier suppliers to report on their suppliers and operations within suppliers' supply chains.</p>
<p><b>Self-assessment Questionnaires</b></p> <p>Robert Walters will send onboarding questionnaires to new and existing suppliers requiring them to provide information related to their operations and supply chains.</p>	<p><b>Supplier mapping</b></p> <p>Robert Walters aims to prepare a map of its supply chain.</p>
<p><b>Supplier Code of Conduct</b></p> <p>Robert Walters will send a soft copy of its Supplier Code of Conduct to all existing and new suppliers. We will require all suppliers to comply with the Code as a condition of providing goods or services to Robert Walters.</p>	

This statement was approved by the board of Robert Walters Pty Ltd on 15 June 2021.



James Nicholson  
Chief Executive Officer – Asia Pacific  
Robert Walters Pty Ltd  
6 July 2021