SEEK
Modern Slavery Statement 2025

seek

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Scope of this Statement

This Statement addresses the requirements of the *Modern Slavery Act 2018 (Cth)* for the entities owned or controlled by SEEK Limited (ABN: 46 080 075 314). It covers the period 1 July 2024 to 30 June 2025. Refer to page 14 for an overview of where each of the mandatory criteria have been addressed.

This Statement excludes investments held by SEEK Limited that are not under its operational control, including the SEEK Growth Fund (the Fund) and assets owned or managed by the Fund, such as Zhaopin.

Sidekicker was re-acquired by SEEK on 30 May 2025. Refer to SEEK's FY2025 Financial Statements Note 20 for more information. Sidekicker will be included in SEEK's modern slavery reporting from FY2026.

Acknowledgement of Country

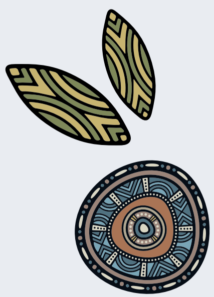
SEEK acknowledges the Traditional Custodians of the lands on which it operates. We extend this acknowledgement to all First Nations peoples across the Asia Pacific region in which SEEK is proud to operate.

We pay respects to their rich cultures, to Elders past and present, and the continuing custodianship of the land, waterways and community on which we all rely.

We recognise the ongoing contribution of First Nations peoples to the diverse communities in which we belong.

The gum leaf represents a symbol of welcome and it acknowledges the diverse countries[1], environments and communities.

Artist: Bitja, (Dixon Patten)
Gunnai, Yorta Yorta, Dhudhuroa, Gunditjmara, Bayila Creative



(1) In this context, 'countries' refers to the tribal areas, not explicitly Australia and other countries.

Message from the Managing Director and Chief Executive Officer

Ian Narev, Managing Director and Chief Executive Officer

I am pleased to present our Modern Slavery Statement for 2025.

Human rights is a priority sustainability topic for SEEK. Addressing modern slavery risk is our highest priority in this area, given the nature of our core business. This Statement gives us the opportunity each year to share our progress and challenges in our efforts to prevent and manage modern slavery risk in our business.

Throughout FY2025, we have improved our approach to identifying and addressing modern slavery risks in both the operations of our employment marketplaces and our supply chain. Protection of candidates is core to our purpose. We take a proactive approach to preventing exploitative recruitment on our platform, including through new and improved intelligence and verification technologies. We continuously see the benefits of more than a decade of focus on artificial intelligence (AI) within SEEK; as everyone is well aware, the pace of change in AI is faster than ever, which both increases risks and provides new tools to mitigate the risk. We exclude high-risk hirers during our onboarding process where required, scan job ads across Asia Pacific (APAC) for identified fair hiring risks and respond to customer feedback on suspicious job ads.

In our supply chains, we improved our risk analysis to cover all SEEK's direct suppliers for modern slavery risk. We also broadened our definition of residual risk suppliers required to undergo remediation. We have now audited all incumbent cleaning contractors, with all remediation steps implemented where required.

We also continued to work with relevant government agencies across APAC and non-governmental organisations to improve industry learning and knowledge sharing.

Looking ahead, we will continue to look for opportunities to use our unique position to influence employment market practices and to improve the way we address modern slavery in our supply chains.

We recognise that tackling modern slavery requires ongoing effort. We remain committed to working with our customers, suppliers, and stakeholders to address these complex challenges.

We welcome comments on this Statement, which you can provide by emailing us at: sustainability@seek.com.au

Ian Narev
Managing Director and Chief Executive Officer

Highlights

Automatically scanned **100%** of direct and indirect job ads for fair hiring risks

Approximately 8% escalated for manual review

Excluded **651** hirers during onboarding because of high-risk indicators (representing less than 1% of hirers)

Removed more than **2,700** job ads following manual review or verified customer complaints (representing less than 1% of job ads)

Analysed **100%** of SEEK's direct supply chain for modern slavery risk

Completed modern slavery risk assessments of **72%** of inherent risk suppliers to identify those with residual risk

Audited all incumbent cleaning contractors for modern slavery risk and implemented remediation steps where required

SEEK overview

Our purpose

We help people live more fulfilling and productive working lives and help organisations succeed.

About SEEK

- Operates market-leading online employment marketplaces in Australia, New Zealand and six markets in Asia.
- Focused on providing candidates with all the job opportunities relevant to them and enabling hirers to reach all relevant prospective employees.
- Develops and applies innovative data and technology tools to facilitate high-quality matching and improve reliability of marketplace information.
- Has minority investments in employment marketplaces in China, South Korea and Bangladesh.
- Listed on the Australian Securities Exchange with headquarters in Melbourne, Australia.

SEEK operations

Geographical coverage represents the countries of operation of SEEK's controlled(1) online employment marketplaces.

SEEK's FY2025 Reporting Suite includes the following:

- Annual Report
- Corporate Governance Statement
- Sustainability Report
- Modern Slavery Statement (this statement)
- Climate Statement

All reports are available at seek.com.au/about/investors/

(1) Control refers to entities that meet the definition of a consolidated subsidiary under Australian Accounting Standards.

Structure, operations and supply chains

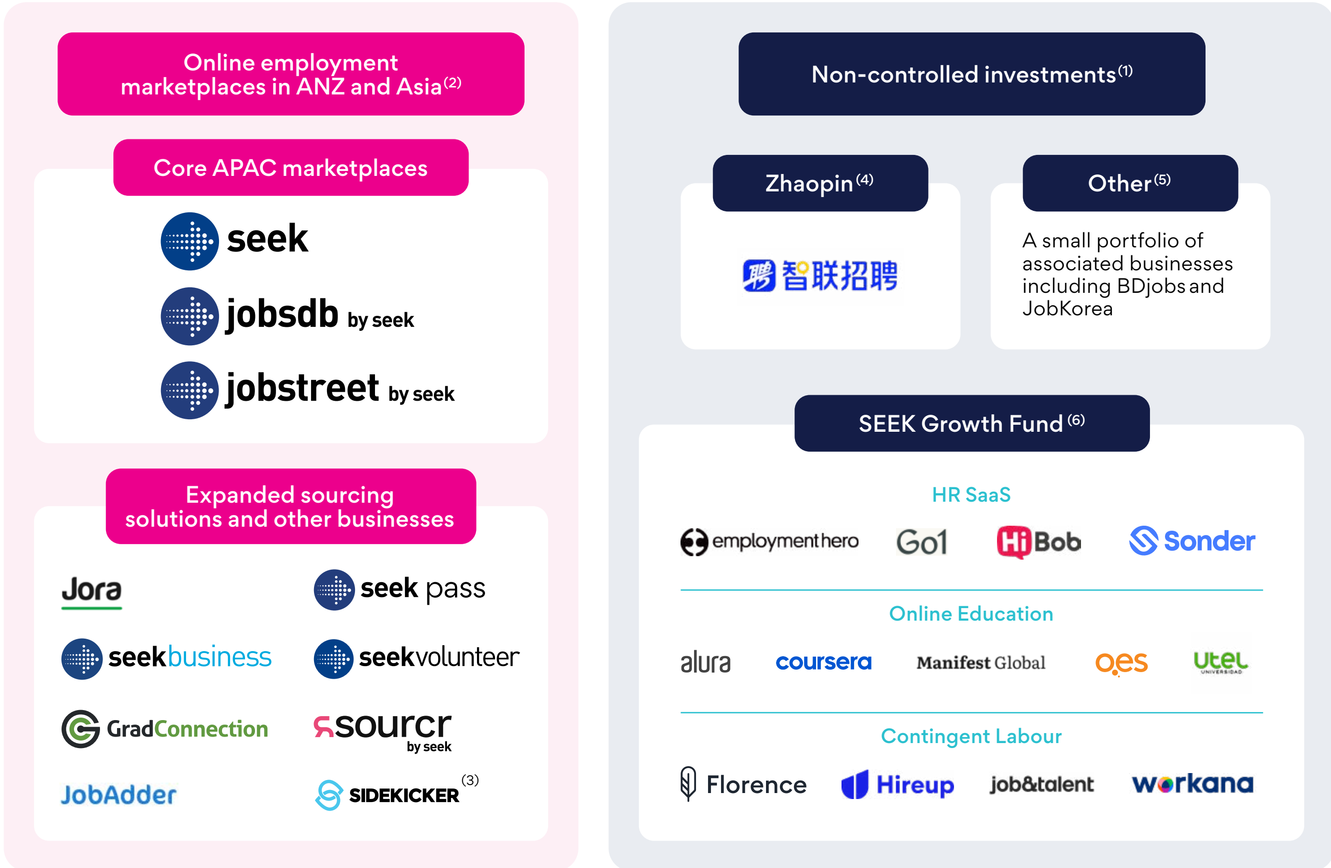
Structure

SEEK Limited is listed on the Australian Securities Exchange (ASX:SEK) with headquarters in Melbourne, Australia. Founded in 1997, SEEK operates market-leading online employment marketplaces in eight countries across Asia Pacific (APAC).

SEEK Limited is the ultimate parent company of the SEEK group of companies and is the only reporting entity under the *Modern Slavery Act 2018 (Cth)*.

The APAC online employment marketplaces are held under the subsidiary SEEK AP&A Pty Ltd (ABN 41 626 880 037). SEEK also has an interest in the SEEK Growth Fund (the Fund) which is held under the subsidiary SEEK International Investments Pty Ltd (ABN 15 121 858 231).

The Fund is a unit trust that holds investments in a portfolio of investments in the human capital management industry. The Fund and assets managed by the Fund (such as Zhaopin) are excluded from this Statement because the Fund operates independently of SEEK and is not under SEEK's control.



Operations

Online employment marketplaces

SEEK facilitates the matching of candidates with job opportunities and other related services via websites and apps referred to as online employment marketplaces. This activity focuses on innovative products that use data and technology to facilitate high quality matching and improve reliability of marketplace information. The products connect candidates with relevant, personalised job opportunities and enable hirers to fill vacancies and streamline their recruitment processes.

SEEK's workforce

SEEK employs a professional workforce in a hybrid-working model. As at the end of FY2025, SEEK's APAC workforce comprised 3,062 employees, with a roughly equal distribution across the region. Most employees were employed permanently, with 4% employed on either a fixed-term or casual basis. Full-time employees accounted for 96% of the workforce, with part-time employees comprising 4% of the workforce. People who work for SEEK are employed directly and the majority of SEEK's workforce are on permanent contracts in professional roles.

SEEK maintains a contingent workforce of contractors and business partners to provide flexible access to specialised skills and short-term capabilities.

JobAdder comprised 183 employees as at the end of FY2025.

(1) Control refers to entities that meet the definition of a consolidated subsidiary under Australian Accounting Standards. Non-controlled investments are entities that do not meet this definition.
(2) Online employment marketplaces comprise ANZ, Asia and Corporate costs segments, as disclosed in the Financial Report Note 1 Segment information.
(3) SEEK reacquired Sidekicker on 30 May 2025. SEEK's ownership in Sidekicker is 100.0%. Refer to Financial Report Note 20 Business combination.
(4) SEEK's equity accounted ownership in Beijing Wangpin Consulting Co. Ltd ('Zhaopin') (headquartered in Beijing, China) is 23.5%.
(5) SEEK holds a 37.0% investment in BDJobs (headquartered in Dhaka, Bangladesh) and a 10.0% investment in JobKorea (headquartered in Seoul, South Korea). SEEK equity accounts for its BDJobs investment and holds its JobKorea investment as a financial asset.
(6) SEEK's equity accounted ownership in SEEK Growth Fund ('the Fund') is 83.8%. SEEK does not control the Fund.

Structure, operations and supply chains (continued)

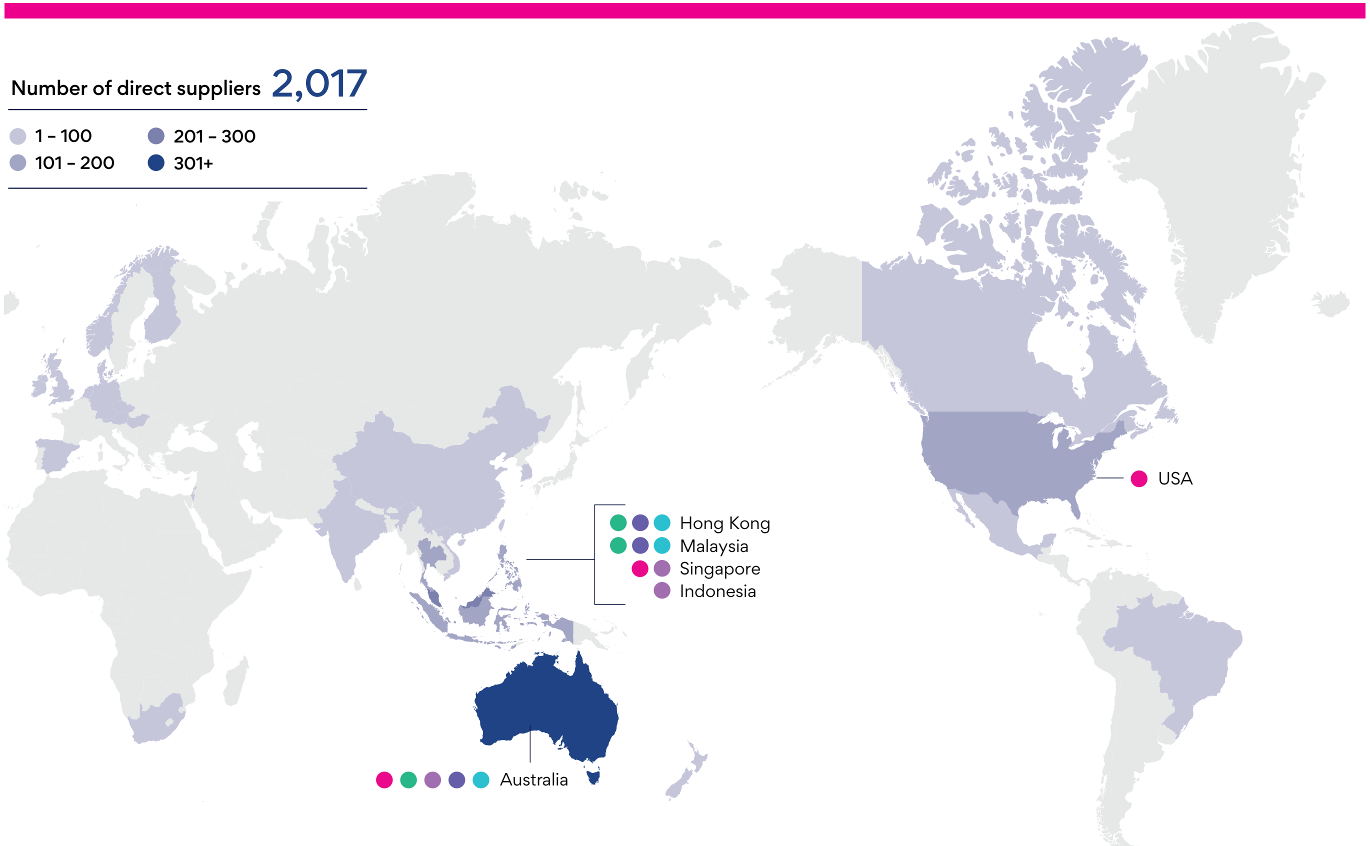
Supply chains

During FY2025, SEEK's total value of spend with suppliers was approximately A$280m, comprising over 2,000 suppliers located in approximately 35 countries.

SEEK has a centralised Procurement team, responsible for high-value, complex procurement of goods and services. This team supports the Risk and Assurance team in managing supply chain risks, including modern slavery risks. Lower value procurement is decentralised across the business, however controls are in place to manage modern slavery risk regardless of value. These controls are designed and monitored by the Procurement team.

As an online business, SEEK's principal categories of spend are technology (software and support services), marketing and business services. During FY2025, these represented approximately 77% of SEEK's global procurement spend and 64% of its suppliers. As an Australian-headquartered business, 67% of SEEK's FY2025 spend was with Australian suppliers. The majority of the remaining spend was with suppliers located in South East Asia, reflecting the regions in which SEEK operated in FY2025.

The map sets out SEEK's principal categories of spend and key sourcing countries.



Technology (software and support services)

32% of FY2025 spend

SEEK relies on a diverse technology supply chain to develop, maintain and deliver products and services to customers and employees in a way that promotes service reliability and the protection of candidate, hirer, employee and business data. Includes:

- software licences and services (communications, data and security services); and
- cloud and data centre storage.

Marketing

24% of FY2025 spend

SEEK works with a broad range of creative and media suppliers, across both digital and traditional media channels, to reach and engage candidates and hirers across key segments. Includes:

- digital (media and advertising, creative agencies, public relations);
- content production; and
- promotional products and events.

Business services

21% of FY2025 spend

SEEK leverages business and professional service suppliers to obtain specialist resources and expertise to meet specific technical and product needs, working in conjunction with its employees. Includes:

- technical consulting services;
- systems implementation services;
- legal, professional and audit services; and
- specialist contractor agencies.

Other

12% of FY2025 spend

This category includes:

- IT hardware and peripherals;
- business travel;
- office supplies;
- food and beverage; and
- other operations equipment.

Facilities

11% of FY2025 spend

SEEK engages a range of suppliers to deliver goods and services integral to the provision of a safe, productive and enjoyable work environment for its employees. Includes:

- office space lease and fit-out;
- services (cleaning and maintenance, security services, waste management); and
- goods (office furniture and fixtures).

Modern slavery risks and risk management

SEEK is focused on implementing strategies to prevent exploitative recruitment on its employment platform and to prevent and manage modern slavery risks in its supply chains.

The following table sets out modern slavery risk areas for SEEK's operations and supply chains and the actions that SEEK is taking to manage those risks.

	Risk	Actions to manage risks	Type of potential impact – UNGPs continuum of involvement [1]
Operations – online employment marketplaces	SEEK's online employment marketplaces could be used to advertise job ads by illegitimate or fake hirers to coerce candidates into situations of modern slavery. Hirers may post job ads for opportunities which involve: • illegal or illegitimate jobs; • deceptive recruitment leading to modern slavery; • workers paying for jobs; or • discrimination.	SEEK's fair hiring program is designed to prevent exploitative recruitment and modern slavery on its employment platform. Information on the processes and controls in the fair hiring program is set out on pages 8–9.	Contribute
Supply chains	Modern slavery could occur at various tiers within SEEK's supply chain. This risk is influenced by factors such as the supplier's industry and location of operation. The majority of SEEK's direct suppliers have low risk for modern slavery as they are operating in industries that employ skilled workers. Industries of particular concern to SEEK in secondary levels of its supply chain are real estate, construction, and computer related services.	SEEK applies its Supply Chain Risk Framework to analyse, assess and address modern slavery risk within its supply chains. Information on the Supply Chain Risk Framework is set out on pages 10–11.	**Tier 1 suppliers[2]:** Contribute **Tier 2 suppliers[3]:** Directly linked
Operations – workforce	SEEK's office operations could directly result in modern slavery practices through modern slavery being present in SEEK's direct or indirect workforce. This risk is low for SEEK due to the composition and locations of its workforce. JobAdder also engages third party developers in Vietnam, who are skilled workers reporting directly to JobAdder employees. For more information on workforce composition, see the 'SEEK workforce' section on page 4.	SEEK undertakes pre-hire checks to ensure that candidates have appropriate legal rights to work as part of the recruitment process. This includes verifying valid identity documents and visas for the location where they will be working. For contingent workers, SEEK's procurement processes apply, and external providers are requested to acknowledge SEEK's Supplier Code of Conduct. JobAdder has direct oversight of the working standards for JobAdder's contingent workforce in Vietnam.	Cause

(1) SEEK aligns its approach to understanding and assessing its modern slavery risks with the United Nations Guiding Principles on Business and Human Rights (UNGPs). The UNGPs establish a three-part 'continuum of involvement' that explains that a company may:
- 'cause' modern slavery or impact human rights through their operational activities where its actions directly result in modern slavery occurring;
- 'contribute' to modern slavery or human rights impacts through operational activities where its actions or omissions facilitate or incentivise modern slavery; or
- be 'directly linked' to modern slavery or human rights impacts through its business relationships, services, products or operations (this includes situations where modern slavery may occur in businesses' extended supply chain).

(2) Tier 1 suppliers: Suppliers directly engaged by SEEK.
(3) Tier 2 suppliers: Suppliers that provide goods or services to direct suppliers of SEEK.

Modern slavery risks and risk management (continued)

Risk Management Framework

SEEK's human rights risks are managed in accordance with SEEK's Risk Management Framework. Modern slavery risk is considered as part of SEEK's principal risk relating to 'Social and environmental'. Refer to SEEK's FY2025 Annual Report for more information on SEEK's principal risks.

SEEK's fair hiring risk assessments are used to assess the risk (to candidates and SEEK) of breaches of fair hiring practices in each country in which SEEK operates. Risk assessments are also used when identifying and assessing suspicious hirers and deciding what action to take.

SEEK's Supply Chain Risk Framework is used to identify and assess modern slavery risks in SEEK's supply chain. The framework was developed in collaboration with SEEK's Risk and Assurance team and is aligned with SEEK's overarching Risk Management Framework.

Governance of modern slavery risks

SEEK's fair hiring and modern slavery approach is integrated into SEEK's broader governance structure. The Board, through the Audit and Risk Management Committee (ARMC), is responsible for oversight and management of material risks, including human rights-related risks. The Board reviews and approves SEEK's Modern Slavery Statement annually.

The ARMC has delegated authority from the Board for monitoring management of Environmental Social and Governance (ESG) risks and opportunities, including modern slavery risks. The Committee receives updates on SEEK's modern slavery risk environment, SEEK's actions to manage these risks and any changes to the regulatory landscape.

The fair hiring program is led by the Managing Director and Chief Executive Officer (CEO) and is overseen by the Fair Hiring and Modern Slavery Steering Committee. This Committee is chaired by the CEO and its role is to review the operational performance of SEEK's fair hiring and supply chain risk management controls. Relevant metrics are tracked and reported to this Committee quarterly.

The Procurement team is responsible for coordinating the programs to manage modern slavery risks in the supply chain, including the application of the Supply Chain Risk Framework. Supply chain metrics are tracked and reported to management on a bi-monthly basis and to the Fair Hiring and Modern Slavery Steering Committee quarterly.

SEEK's Risk and Assurance team supports the fair hiring and modern slavery programs by: performing risk reviews of the countries that SEEK's employment platform operates; assessing the control effectiveness of hirer and job ad screening processes; tracking operational metrics; identifying areas for improvement; coordinating the Fair Hiring and Modern Slavery Steering Committee; and recording and tracking agreed actions related to modern slavery risks.

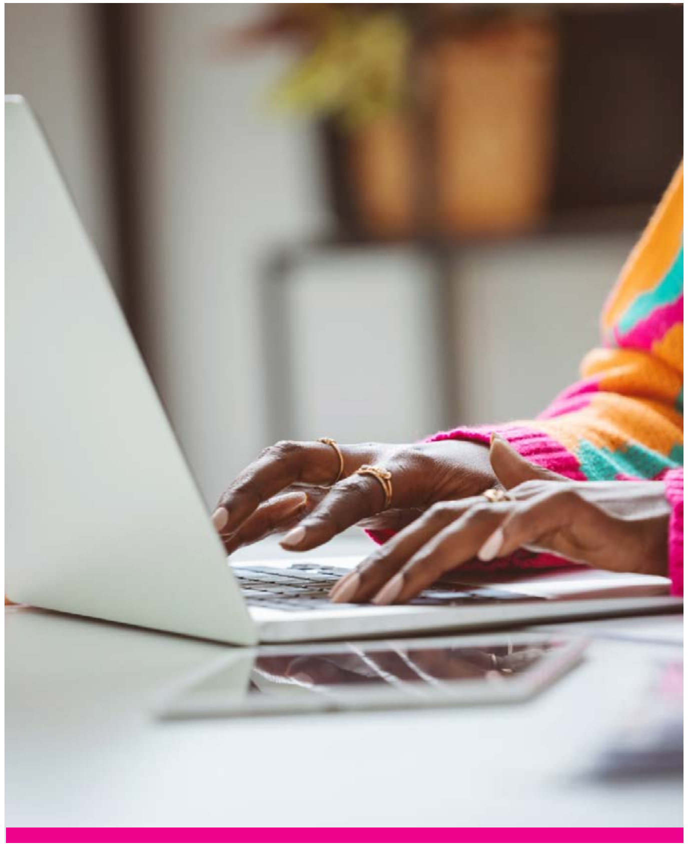
SEEK's Chief Financial Officer is accountable for modern slavery reporting, which is the responsibility of the SEEK Governance and Sustainability team.

Grievance management

SEEK's whistleblower channels are a key mechanism for reporting illegal or unethical practices, including in relation to modern slavery. SEEK's Whistleblower Protection Policy encourages employees and stakeholders to report concerns of wrongdoing. The policy covers all SEEK's current or former employees, officers, contractors, suppliers (paid or unpaid), and their relatives, dependants or spouses. It sets out how to raise concerns, the protections that a person making a report will receive and SEEK's processes for dealing with reports of wrongdoing. Where whistleblower reports are received, they are investigated and, if appropriate, actions are taken. SEEK is committed to protecting whistleblowers from reprisal and other detriment.

SEEK's Whistleblower Protection Policy is available on SEEK's website and to employees on SEEK's intranet. The whistleblower channels are also communicated across SEEK offices through internal TV screens and posters to increase accessibility and awareness for all stakeholders, such as cleaning contractors.

The ARMC receives notifications regarding material whistleblower reports and updates on any incidents reported through SEEK's whistleblower channels. This Committee is supported by SEEK's Compliance Officer, who oversees the response to whistleblower reports.



Operations – fair hiring

SEEK's fair hiring program aims to improve working lives by preventing exploitative recruitment and modern slavery.

As a leader in online employment marketplaces across APAC, SEEK has an important role to play in eliminating unfair hiring practices. Walk Free's Global Slavery Index identifies Asia and the Pacific as the third most vulnerable region to modern slavery. The region is home to many migrant workers who are particularly exposed to exploitation. These workers face a range of threats, including abuse by recruitment and employment agencies, debt bondage, restricted movement and withheld travel documents.

To manage fair hiring risk, SEEK implements a fair hiring program. Through the program, SEEK aims to operate its platform in a manner that supports ethical recruitment and includes job ads that are free from:

- illegitimate or illegal jobs, for example roles at scamming call centres;
- deceptive recruitment leading to modern slavery;
- unethical or unlawful charges or placement fees where the worker pays for a job; and
- discriminatory language or requirements.

SEEK continuously reviews and adapts its fair hiring approach to reflect the fair hiring risk environment across the APAC region and any emerging trends. For example, there is an increase in the use and sophistication of artificial intelligence (AI) from illegitimate hirers, and an increase in the number of scammers imitating SEEK and contacting candidates through SMS, messaging apps and social media platforms. To respond to these trends, SEEK continues to enhance its fraud detection measures including automated blocking systems and improved verification processes, works with government and non-government bodies to facilitate knowledge and intelligence sharing, and raises candidates' awareness of job scam trends and other threats.

Fair hiring controls

The key controls that support the fair hiring program to prevent exploitative recruitment and modern slavery are summarised below. The controls operate across APAC for all direct job ads (i.e. those posted directly to the SEEK website) and indirect job ads (i.e. job ads posted by hirers through a third-party platform). Metrics are tracked against each of these controls and reported to the Modern Slavery and Fair Hiring Steering Committee. Other SEEK businesses also operate similar checks and procedures to ensure hirers are legitimate and job ads are genuine before job ads are posted live.

Hirer onboarding

Hirer onboarding services act as SEEK's first line of defence in preventing fraudulent hirers from entering SEEK's platform.

SEEK's Trust and Safety team operates detailed checks and procedures to ensure hirers are legitimate.

Content moderation

Job ad quality control processes allow SEEK to capture fraud, scams and discrimination.

SEEK's platform provides automated tools and recommendations to help hirers produce informative job ads while avoiding discriminatory or otherwise offensive content.

Where appropriate, hirers are educated on how to improve the content of their ads to eliminate discriminatory terms, or ads are blocked where they contravene SEEK's Terms and Conditions.

Complaint management

Candidates can report job ads to SEEK.

Every ad has an option available on desktop, web and mobile to report the ad. There are three reasons to report an ad that can be selected: fraudulent, discrimination or misleading.

SEEK then reviews the ad and determines if an action is required.

Candidates are also able to identify and report a hirer should its off-platform communications not align with the original job ad.

Employment platform risk assessments

SEEK assesses the modern slavery risk in each country in which it operates and then prioritises its employment platform assurance activities based on the outcomes of this annual assessment. Each employment marketplace is assigned a country risk rating based on external data available through the Walk Free Global Slavery Index 2023 and the annual Trafficking in Persons Report, produced by the United States Department of State. Local recruitment practices associated with each employment marketplace contribute to the risk rating, for example overseas recruitment, placement fees and prevalence of recruitment scams.

In FY2025, a review of Jora was completed that focused on direct hirer risk. The review assessed Jora's controls for its hirer onboarding and verification, job ad quality control and the monitoring and escalation of complaints and fraud. The review identified a number of improvement opportunities that will be implemented in FY2026 to improve Jora's processes including improvements in screening, AI-driven job ad content moderation and trust-signal labelling.

Operations – fair hiring (continued)

Candidate security measures

SEEK's Security and Privacy Hub contains security and privacy resources that include location-related updates on the latest scams and tips, along with links to government-specific online safety resources. This hub highlights the latest scams targeting candidates and hirers on the SEEK platform as well as impersonation scams on other messaging services. The hub also contains tips on what customers can do if they believe they have been scammed.

SEEK works with the National Anti-Scam Centre (NASC) to facilitate knowledge and intelligence sharing. This sharing enabled SEEK to move quickly when informed by NASC that a 'smishing' impersonation scam was targeting SEEK at scale. SEEK provided an example of the malicious fraudulent text campaign via its Security and Privacy Hub with advice for candidates on appropriate actions.

Refer to seek.com.au/security-privacy

SEEK has implemented additional measures to help candidates protect themselves from fraudulent job ads. Warnings to protect personal and financial information are embedded in the online job application process. Candidates are also encouraged to use the free platform, SEEK Pass, to verify claims made in job applications without having to directly share sensitive personal documents with hirers. In FY2025, SEEK updated the SEEK Pass user interface and rolled it out to SEEK's employment marketplaces across Asia.

Refer to seekpass.co

Employee training program

During FY2025, SEEK continued its employee training program with a focus on fair hiring-related processes across the unified platform. Training and engagement focused on key teams including the Trust and Safety and Customer Service teams.

In addition, an ongoing training program focuses on the continued upskilling of SEEK's Trust and Safety team. The aim is to build the team's understanding of the types of fraud that can take place on SEEK's platform such as cryptocurrency scams, identity theft and money laundering. The training simulates key job ad processes including establishing a fraudulent account, applying to a job ad, using a fake candidate account before closing it, closing a job ad and monitoring a candidate's email inbox.

In FY2026, employee training will focus on reinforcing employee understanding of the fair hiring program. This will include fair hiring principles, common forms of modern slavery across APAC, how crime syndicates are involved with modern slavery, what SEEK is doing to keep its platform safe and case studies on high-risk situations. The training will be provided to the SEEK APAC Commercial, Product and AI teams via townhall and all staff communications.

Taking action on modern slavery – actions to prevent exploitative recruitment

SEEK continues to identify and report potential instances of modern slavery on its employment platform. Examples of actions taken by SEEK in response include the following:

- SEEK identified through candidate complaints in Indonesia that some hirers were requesting payments from candidates for interview opportunities. This is a breach of SEEK's standards and Terms and Conditions of use. Upon investigation, SEEK discovered that fraudulent hirers had posted job advertisements requesting upfront payments. As a result, SEEK removed all identified fraudulent hirers from the platform and implemented enhanced fraud detection measures including automated blocking systems and improved verification processes.
- SEEK identified through a notification from a hirer that their credentials were obtained and used to access the hirer's JobsDB Hong Kong account. The access was used to perform fraudulent acts including accessing candidate information and posting fraudulent job ads. SEEK removed the fraudulent ads, blocked the user email and IP addresses, and resecured the account.
- Jora was notified via candidate complaints that a fraudulent actor was onboarded onto its platform. The fraudulent actor was able to list businesses and post job ads impersonating a hirer's account. The SEEK and Jora teams worked with the impacted hirer to understand the incident and impacts and implemented improvements to the Jora hirer verification process.
- SEEK continued to monitor a group of companies linked to human trafficking in the commercial scamming industry in South-East Asia and identified and removed hirers related to this scam from SEEK's platform, including during hirer onboarding and verification processes.

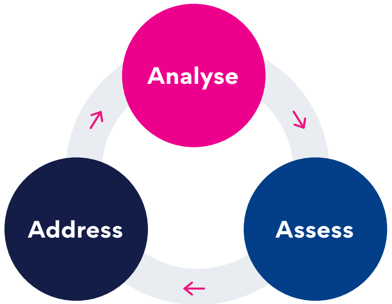
During FY2025, there was a general increase in the number of attempted job ad recruitment scams using SEEK or other SEEK brands. The majority of scams are conducted via WhatsApp where SEEK has little ability to take proactive action. As SEEK becomes aware of scams, it updates its 'Current Scams' page to provide warnings to candidates not to engage with these scams. See seek.com.au/security-privacy/current-scams

Supply chains

SEEK applies its Supply Chain Risk Framework to identify and address modern slavery risk within its supply chains.

Supply Chain Risk Framework

SEEK's Supply Chain Risk Framework involves a three-step approach – analyse, assess and address – and is applied to new and existing suppliers.



Analyse

SEEK partners with third-party platform, Fair Supply,[1] which conducts modern slavery risk analysis on SEEK's existing and potential suppliers. The analysis is based on a range of risk factors, including the country where the supplier is located, supplier industry and the type of goods or services purchased[2]. All direct suppliers are re-analysed for modern slavery risk every two years. Suppliers with inherent risk are progressed to the 'Assess' stage of the framework.

During FY2025, SEEK analysed 100% of its direct suppliers for modern slavery risk. 411 suppliers (20% of SEEK's total suppliers) were classified as having inherent modern slavery risk.

Inherent risk supplier

A supplier has inherent risk of modern slavery taking place in its operations or supply chains if it has undergone Fair Supply's supply chain risk analysis and met the following criteria:

- the estimated number of people in the business' supply chain in forced labour is equal to or greater than 0.1 people per million dollars spent; and
- SEEK has spent over A$1,000 with the supplier over the previous 12 months[3].

Assess

SEEK requires both existing and potential suppliers that meet any of the following criteria to undergo a modern slavery due diligence assessment:

- suppliers with inherent risk of modern slavery;
- suppliers that have had accusations of modern slavery incidents made against them; or
- cleaning suppliers.

These suppliers are required to complete a modern slavery due diligence questionnaire and receive a residual risk score based on their responses.

Suppliers from high-risk industries such as cleaning may be asked to undergo a modern slavery audit. This involves an independent auditor reviewing each supplier's governance processes and interviewing workers to confirm whether these processes are adhered to. If a supplier is not willing to undergo this questionnaire or audit, SEEK takes proportionate remedial steps, which may include contract termination. If suppliers are found to have residual risk, they progress to the 'Address' stage of the framework. During FY2025, SEEK expanded its definition of residual risk to include the questionnaire score in addition to the audit outcome.

In FY2025, SEEK assessed 72% of its inherent risk suppliers (FY2024: 31%). Of those assessed, 67 suppliers (3% of SEEK's total suppliers) were classified as having residual risk and one supplier was not engaged as it refused to participate in an audit.

Residual risk supplier

A supplier has residual risk of modern slavery taking place in its operations or supply chains if it meets the following criteria:

- supplier has received a score of 'Basic' in the modern slavery due diligence questionnaire (added in FY2025); or
- supplier has undergone a modern slavery audit and been found to have major non-compliance(s).

Address

SEEK works with residual risk suppliers to address their identified risks. The engagement can be performed directly by SEEK, or training and guidance can be provided through a third party.

Consistent with SEEK's Supplier Code of Conduct and Modern Slavery Remediation Strategy, if an existing or potential supplier is unable or unwilling to take satisfactory steps to address gaps in controls, SEEK may take proportionate remedial steps. This may result in contract termination, or in the case of potential suppliers, the contract will not progress.

In FY2025, SEEK supported more than 40 suppliers to improve their processes and align with SEEK's Supplier Code of Conduct. This included meeting with suppliers to discuss opportunities for improvement and providing guidance documents which contained examples of best practice. In some cases, the auditor met with suppliers and provided guidance. Engagement with residual risk suppliers will continue in FY2026.

(1) Fair Supply is an Australian based sustainability risk management and compliance platform. It uses internationally recognised data sets to quantify modern slavery risk within supply chains.
(2) Fair Supply's supply chain risk analysis is performed using supply chain data from 190 countries in over 15,000 industry sectors. Risk is quantified using a range of economic and human rights standards including: The United Nations System of National Accounts and the Walk Free Global Slavery Index. This information and SEEK's spend data are used to quantify the estimated number of people in forced labour per million dollars spent with a supplier.
(3) This methodology is managed by the Procurement team and was developed in consultation with Fair Supply and SEEK's Risk and Assurance team.

Supply chains (continued)

Applying the Supply Chain Risk Framework to tier 2 suppliers

SEEK recognises that modern slavery risks exist in the secondary levels of its supply chain. For example, a direct supplier of data services to SEEK may have a low inherent risk of modern slavery, however an IT manufacturer engaged by that data services supplier may have an elevated risk of modern slavery.

During FY2025, SEEK conducted a gap analysis of its current approach to managing tier 2 supplier risk compared to best practice and peer approaches. The findings informed the development of SEEK's FY2026 – FY2028 Modern Slavery in Supply Chains strategic roadmap, which will have a focus on developing robust due diligence controls for SEEK's risk in tier 2 and beyond of its supply chain.

SEEK manages its indirect supplier risk through supplier assessment processes that require suppliers to answer a range of questions relating to the due diligence of their own supply chains. SEEK also continues to review the risk of modern slavery in tier 2 suppliers using Fair Supply's supply chain risk analysis framework. In FY2025, it identified the industries of particular risk to SEEK as real estate, construction and computer related services. During FY2026, SEEK will establish modern slavery due diligence processes for these tier 2 industries.

Managing modern slavery risk when engaging new suppliers

Preventing the risk of engaging a new supplier with links to modern slavery is managed in a number of ways including:

- Supplier Sourcing Policy – provides guidance on responsible spending that balances commercial value with risk, security, ESG and legal requirements.
- Procurement ESG Playbook – provides guidance for SEEK's Procurement team on how and when modern slavery controls should be included in SEEK's procurement processes (e.g. supplier due diligence questions and evaluation score weightings).
- Supplier Code of Conduct – defines standards and practices that SEEK expects suppliers to observe when interacting with SEEK, other organisations and the wider community.
- Fit-for-purpose modern slavery contract requirements – provide assurance that a supplier's operations, sub-contractors and supply chains do not contravene modern slavery laws and standards.
- Onboarding process – checks all new suppliers added to SEEK's Enterprise Resource Planning platform for modern slavery risk.

Modern slavery audits – investigating and addressing poor practices in SEEK's supply chain

During FY2025, SEEK audited seven cleaning contractors for modern slavery risk. The audits were conducted by an independent third-party specialist. The audits consisted of an onsite review of the contractors' governance processes and face-to-face interviews with their employees when required. Following each audit, employee interview responses were anonymised, and findings were reported back to SEEK.

Of the contractors audited, two were found to be operating in ways that did not meet SEEK's expectations. The issues identified related to governance practices (e.g. a lack of formalised policies). As a result, SEEK initiated its Modern Slavery Remediation Strategy with both suppliers and worked with them to develop a remediation plan that would result in SEEK's concerns being addressed within an agreed timeline. Both suppliers were receptive to the process and committed to delivering on their remediation plans. Each supplier was audited again within six months and both suppliers provided satisfactory evidence that the issues had been resolved.

During FY2025, SEEK also worked closely with the suppliers that required remediation following its FY2024 cleaning audits. All of these suppliers were able to deliver their remediation plans and continue to be engaged by SEEK.

During FY2026, SEEK will re-audit the suppliers that required remediation during FY2025, audit any new cleaning contractors prior to their engagement and will commence an audit program with a new high risk supplier industry.

Assessing effectiveness

Operations – fair hiring

Effectiveness for SEEK in addressing its fair hiring risks is defined as:

- **The controls and processes implemented to manage fair hiring risks are operating as intended; and**
- **Improvements to the processes and controls that manage fair hiring risks are identified and implemented.**

SEEK's fair hiring program includes a range of controls and processes to address the risks to candidates as they search for jobs. These are set out on pages 8–9 and aim to identify high-risk hirers earlier in the process to ultimately lead to fewer illegitimate or illegal job ads being posted on SEEK's platform.

Controls and processes

Some of the metrics that SEEK uses to assess the effectiveness of its fair hiring controls are set out below.

Metric	FY2025	FY2024
Hirer onboarding • Number of hirers deactivated due to failed onboarding process assessment • Number of hirer accounts closed due to fraud/scam or other high-risk activity	• 3,644 • 651 (representing approximately 1% of new hirers)	• 1,419(1) • 170 (representing approximately 1% of new hirers)
Content moderation • % of job ads scanned • % job ads escalated for manual review • Number of high-risk job ads removed after investigation for suspected fraud or non-compliance with SEEK's Terms and Conditions	• 100% (4.3m job ads) • 8% (approximately 338,000 jobs ads) • 2,797 (representing less than 1% of job ads)	• 100% (4.9m job ads)(2) • 10% (approximately 487,000 jobs ads)(2) • 1,232 (representing less than 1% of job ads)
Complaint management • Number of job ads reported by candidates regarding fraud or scams	• 21,882	• 25,657

Identification and implementation of improvements

SEEK continually works to identify and implement improvements that enhance candidate protection and address deceptive recruitment on its employment platform. Key improvements in FY2025 included:

- developing a new Trust and Safety Strategy that focuses on standardising the level of trust across SEEK's marketplaces;
- enhancing the job ad scanning technology tool by continuing to refine job ad blocking and review rules;
- increasing the Trust and Safety team's capacity to support SEEK's Freemium business rollout; and
- conducting a risk review of the Jora platform's direct hirer risk to identify improvements to key controls.

During FY2025, SEEK also developed its FY2026 – FY2028 Fair Hiring strategic roadmap, setting out SEEK's priorities and objectives for the next three years.

Metrics are captured to measure the effectiveness of these improvements. During FY2025, there was an increase in the number of hirers excluded during onboarding because of high-risk indicators, and the number of job ads removed after investigation for suspected fraud or non-compliance with SEEK's Terms and Conditions. These trends are due in part to enhancements in the hirer onboarding and content moderation processes. As a result of these improvements in the hirer screening processes, there has been a decrease in the job ads reported by candidates for suspected fraud or scams compared to the prior year.

The roll out of the Freemium product in FY2025 also tested the effectiveness of SEEK's fair hiring processes with an increased demand for hirer onboarding, content moderation and complaint management. Trends show that there was no increase in fair hiring incidents during the Freemium roll out, indicating that the increased capacity of the Trust and Safety team to support this roll out was effective.

(1) Prior to Platform Unification, independent hirer deactivation processes ran in Asia and ANZ. Post Platform Unification, processes evolved into a single process across APAC.
(2) Prior to Platform Unification, the majority of Asia's indirect job ads were automatically scanned, and post Platform Unification automatic scanning increased to 100%.

Assessing effectiveness (continued)

Supply chains

Effectiveness for SEEK in addressing modern slavery risks in its supply chains is defined as:

- **SEEK's Supply Chain Risk Framework is delivered across its supply chains;**
- **Suppliers with high residual risk are supported to improve their processes; and**
- **Improvements to SEEK's modern slavery supply chain program are identified and implemented.**

Modern slavery risk is continually evolving and SEEK remains committed to measuring the effectiveness of its supply chain work. This monitoring increases confidence that the Supply Chain Risk Framework is being implemented effectively, opportunities for improvement are identified and delivered and suppliers are supported to improve their practices.

Delivering SEEK's Supply Chain Risk Framework

SEEK measures the effectiveness of its Supply Chain Risk Framework based on the metrics set out below.

Metric	FY2025	FY2024
Analyse • % of suppliers analysed for modern slavery risk • Number of suppliers found to have inherent risk following modern slavery risk analysis	• 100% (2,017 suppliers) • 411 (representing 20% of SEEK's total suppliers)	• 91% (2,437 suppliers) • 580 (representing 22% of SEEK's total suppliers)
Assess • % of inherent risk suppliers that have completed a modern slavery risk assessment or audit • Number of modern slavery related incidents identified in SEEK's supply chain	• 72% (294 inherent risk suppliers) • 0	• 31% (182 of SEEK's inherent risk suppliers) • 0

Supporting suppliers with residual risk to improve

SEEK is committed to working with suppliers with high residual risk to support them to improve practices and protect workers. Effectiveness is defined as a supplier committing to improve, engaging with SEEK's remediation process, and delivering on its commitments.

Metric	FY2025	FY2024
Address • Number of suppliers with residual risk following assessment or audit • Number of residual risk suppliers completed remediation	• 67[1] (representing 16% of SEEK's inherent risk suppliers) • 43 (representing 64% of SEEK's residual risk suppliers)	• 4 (representing 1% of SEEK's inherent risk suppliers) • 4 (representing 100% of SEEK's residual risk suppliers)

(1) In FY2025, SEEK expanded its definition of residual risk suppliers. This resulted in an increase in the number of suppliers classified as having residual risk. For more information on the definition, see page 10.

Continuous improvement of modern slavery supply chain program

SEEK is continuously aiming to enhance and develop processes to effectively manage modern slavery risk. SEEK refers to a range of sources to identify opportunities for improvement, including engaging with third-party experts, suppliers and at-risk communities, seeking feedback from stakeholders and learning from past experiences.

During FY2025, SEEK improved its supply chain processes by:

- developing a Modern Slavery Basis of Preparation, setting out SEEK's methodology and guidance for identifying and assessing modern slavery risks within its supply chain;
- reviewing and updating SEEK's Supplier Code of Conduct and Modern Slavery Remediation Strategy to align with best practice;
- integrating JobAdder's suppliers into SEEK's Supply Chain Risk Framework;
- conducting a gap analysis of SEEK's current practice against peers, upcoming compliance requirements and the expectations of stakeholders to inform SEEK's priorities in relation to supply chain risk management over the coming years; and
- developing SEEK's FY2026 – FY2028 Modern Slavery in Supply Chains strategic roadmap, setting out SEEK's priorities and objectives for the next three years.

While more can always be done, these improvements enhance the accuracy, maturity, and effectiveness of SEEK's supply chain due diligence processes.

Consultation and collaboration

Consultation with SEEK's owned and controlled entities

The fair hiring and modern slavery programs of work are managed across APAC. Consultation with relevant SEEK-owned and controlled entities and across functions occurs on a continuous basis through formal and informal channels. Relevant functions include Procurement, Risk and Assurance, Governance and Sustainability, Finance, People and Culture and operational areas. For example, a working group with JobAdder representatives focuses on JobAdder's sustainability-related programs, including in relation to modern slavery.

Collaboration and engagement

SEEK is committed to working with and learning from customers, suppliers, peer companies, government agencies and the community to continuously improve SEEK's understanding of modern slavery risks, controls and the evolving external environment.

Fair hiring

Examples of SEEK's continued collaboration in relation to fair hiring include:

- working with relevant government agencies across APAC to improve industry learning and knowledge. For example, SEEK's Trust and Safety team continues to work with the Australian Competition and Consumer Commission's National Anti-Scam Centre on the prevention of job ad recruitment scams.
- engaging with non-government organisations and experts to partner on initiatives and identify priorities. For example, in late 2024, SEEK continued its participation in the Regional Roundtable on Strengthening Co-operation to Prevent Trafficking in Persons Caused by the Abuse of Technology, as part of the Bali Process. This is a globally recognised forum relating to irregular migration in the APAC region, where public and private sectors come together to propose strategies for preventing trafficking into online scam centres.

Supply chains

As part of its modern slavery supply chain program, SEEK is involved in several professional networks that meet regularly to discuss sustainability topics including modern slavery. This includes the University of Technology Sydney's Social Procurement Community of Practice and the ESG in Technology Procurement Network.

SEEK provides a range of guidance materials to support suppliers to meet SEEK's modern slavery standards and improve their approach to addressing modern slavery risk. SEEK's Procurement team also provides support to individual suppliers when required or requested.

SEEK partners with third-party organisations to perform modern slavery risk analysis and onsite modern slavery audits. Engaging independent subject matter experts with extensive experience in modern slavery and supply chain risks helps ensure SEEK's key supply chain risk management activities are delivered impartially, effectively and using substantiated information.

Index to disclosures

This Statement has been prepared in line with the requirements of the Australian *Modern Slavery Act 2018 (Cth)*. The following table outlines where information related to the mandatory reporting criteria is located within the Statement.

Mandatory reporting criteria	Topic heading and location
Identify the reporting entity	Scope of this Statement: page 1 Structure, operations and supply chains - Structure: page 4
Describe the reporting entity's structure, operations and supply chains	SEEK overview: page 3 Structure, operations and supply chains: pages 4–5
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Modern slavery risks and risk management: pages 6–7
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Modern slavery risks and risk management: pages 6–7 Operations – fair hiring: pages 8–9 Supply chains: pages 10–11
Describe how the reporting entity assesses the effectiveness of these actions	Assessing effectiveness: pages 12–13
Describe the process of consultation with any entities the reporting entity owns or controls	Consultation and collaboration – Consultation with SEEK's owned and controlled entities: page 14
Any other information that the reporting entity considers relevant	Consultation and collaboration – Collaboration and engagement: page 14

This Statement was approved by the Board of SEEK in their capacity as principal governing body of SEEK Limited on 19 August 2025.

Graham Goldsmith
Chairman
Dated 19 August 2025

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