

About SEEK

SEEK's purpose is to help people live more fulfilling and productive working lives and help organisations succeed.

- A market leader in online employment marketplaces
- A multinational presence including Australia, New Zealand, Hong Kong, South East Asia, Brazil and Mexico. In addition, SEEK has minority investments in China, Korea and a number of other countries
- Leverages unique data and technology to create innovative solutions and insights into the future of work
- Employs 3,500+ people across Australia, New Zealand, Asia and Latin America
- Australian listed with headquarters in Melbourne, Victoria

Approximately
55m
candidate
relationships

Approximately
400k
hirer
relationships

Approximately
900m
population
exposure

Brands owned and managed by SEEK

SEEK ANZ



SEEK Asia



Brasil Online



OCC



Platform support



For more information about SEEK

- See how SEEK delivers on its purpose through its values-based culture in the 2022 Sustainability Report.
- Read more about SEEK's strategy and comprehensive information on SEEK's activities, governance and financial performance in the 2022 Annual Report.
- Find a description of SEEK's controlled entities in Note 19 to the Financial Report in the 2022 Annual Report.

→ SEEK's reports can be accessed at seek.com.au/about/ in the 'Investors' and 'Sustainability' sections.

Introduction

SEEK's commitment to improving people's working lives and its focus on long-term success have been constant since SEEK was founded 25 years ago. This includes a determination to have a positive impact on the communities in which SEEK operates. SEEK takes significant steps to identify and address any links between SEEK's operations and supply chains and modern slavery.

The nature and extent of modern slavery around the world means no company's operations or supply chains are immune. SEEK acknowledges its role and responsibility to safeguard against advertising job opportunities that could result in deceptive recruitment for forced or bonded labour, including human trafficking. During FY2022, SEEK's ongoing due diligence program examined this risk in relation to SEEK's employment marketplaces JobStreet Malaysia and Jora. SEEK's Fair Hiring Program is delivering on the commitment to safe and responsible job advertising. Further information about this priority program of work is available in the 2022 Sustainability Report.

SEEK's supply chains involve more than 2,000 direct suppliers located in around 40 countries. SEEK is committed to maintaining and improving systems and processes to identify and mitigate modern slavery risks. SEEK works in collaboration with suppliers and external parties to develop and deliver effective systems and processes to prevent and address modern slavery risks.

Combatting modern slavery is an area of unrelenting focus. SEEK embraces the opportunity to safeguard human rights in its supply chains and through the operation of the employment marketplaces.



Progress addressing modern slavery

Since SEEK's first Modern Slavery Statement in 2020 SEEK has continued to build its knowledge and capacity to address modern slavery risks.

Foundations

- Methodology to assess the risk of deceptive recruitment on employment platforms
- Due diligence assessments of the employment platforms in the Philippines, Thailand, Indonesia, Malaysia and the Jora business
- Focus on fair hiring in SEEK Asia through safe and responsible job advertising
- Collaboration with businesses, NGOs and industry groups to improve approaches to modern slavery risk
- A global framework to assess and address modern slavery risk in SEEK's supply chains
- Third-party due diligence of SEEK's suppliers
- Training for contract managers, procurement and commercial teams so they are able to identify modern slavery risk and collaborate with suppliers in industries with elevated risk

On the horizon

- Due diligence assessments of the employment marketplaces in Singapore and Hong Kong during FY2023, followed by Mexico and Brazil
- Ongoing improvements to hirer and job ad screening with a focus on deceptive recruitment risk, emerging scams and leveraging technology available through the unification of SEEK's ANZ and Asian online employment marketplaces
- Employee training as part of the Fair Hiring Program and the engagement and management of suppliers
- Strengthening supplier due diligence and engagement processes
- Expanding due diligence of tier 2 suppliers
- Audits of high-risk tier 1 suppliers, starting with SEEK's cleaning contractors
- Ongoing review of metrics and targets



ACKNOWLEDGEMENT OF COUNTRY

Cabbe melemungil! (a Woi-wurrung word for "greetings")

SEEK respectfully acknowledges the Traditional Owners of the lands on which it operates.

We acknowledge Australia's Aboriginal and Torres Strait Islander people as Australia's First Peoples, paying respects to their rich cultures, to their Elders past, present and future, and to their continuing custodianship of the land, waterways and community on which we all rely. We extend that respect to all Aboriginal and Torres Strait Islander people.

We recognise and value the ongoing contribution of Aboriginal and Torres Strait Islander people and communities to Australian life and how this enriches us all.

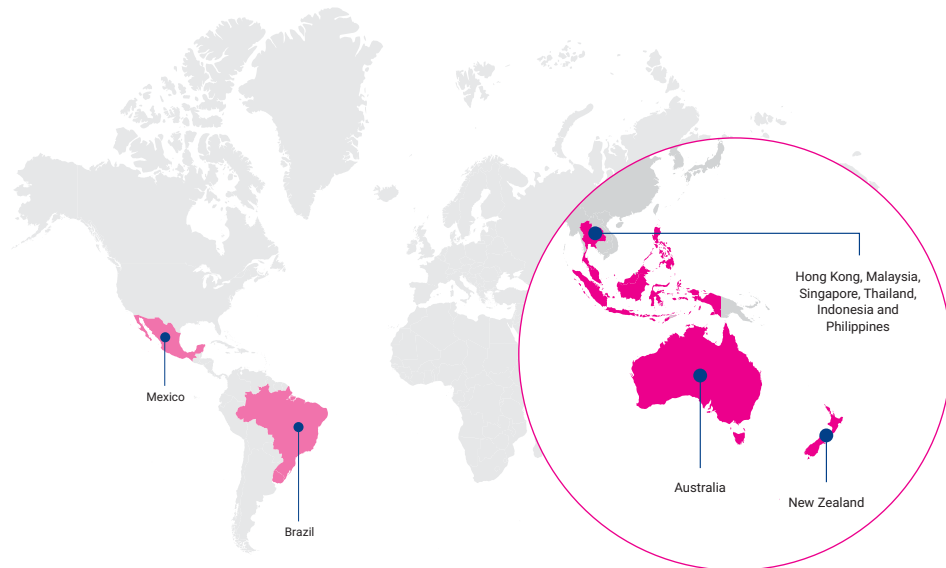
SEEK's structure and operations

SEEK provides online matching of candidates with career opportunities and other related services via websites and apps referred to as employment marketplaces. This activity focuses on innovative products that use data and technology to deliver search and matching for candidates and hirers. The products connect candidates with relevant, personalised job opportunities, and enable hirers to fill vacancies and streamline their recruitment processes.

SEEK's operations

SEEK is an Australian listed company with headquarters in Melbourne. SEEK employs a professional, office-based workforce located in Australia, New Zealand, South East Asia, Hong Kong (supported by a small office in China), Mexico and Brazil.

SEEK has committed to a large-scale Marketplace Unification program to unify SEEK's core employment marketplaces across SEEK ANZ and SEEK Asia (APAC) by the end of FY2024. The unified platform will enable scale efficiencies, rapid innovation and improved reliability and security.



Location of SEEK's employees

Australia	1,356
Malaysia	598
Brazil	539
Mexico	273
Indonesia	208
Philippines	180
Hong Kong	167
Thailand	107
Singapore	44
New Zealand	40
China	21

As at 30 June 2022

Modern slavery risk

Supply chains



SEEK's supply chains consist of over 2,000 suppliers in around 40 countries. Suppliers in SEEK's primary categories of spend are business services, technology (software and support services) and marketing. Beyond these direct suppliers, modern slavery risks may exist in the secondary levels of the supply chains.

Employment marketplaces



SEEK's online employment marketplaces advertise jobs that are placed directly by hirers who also perform the recruitment process. Hirers include small and medium enterprises, corporates, government bodies and recruitment firms. Advertising jobs links SEEK to risks of modern slavery by enabling the advertising of job opportunities that could result in forced labour, trafficking or debt bondage.

Office operations

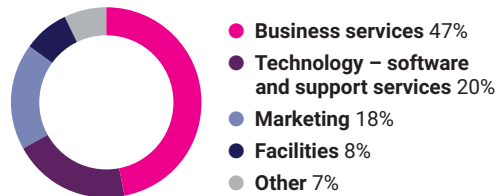


The risk that SEEK's operations directly result in modern slavery practices is low due to the composition and location of the workforce. People who work for SEEK are employed directly and predominantly on permanent contracts in professional roles. During COVID-19 closures in FY2021 and FY2022, consistent with SEEK's commitment to long-term business goals, there were no redundancy programs and no reductions were made to salaries or working hours for permanent staff.

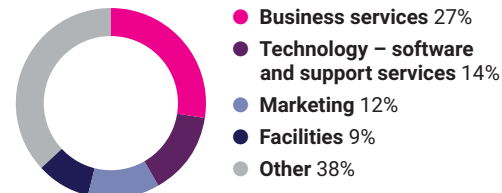
SEEK's supply chains

As an online business, SEEK's principal categories of spend are business services, technology (software and support services) and marketing. During FY2022, these represented approximately 85% of SEEK's global spend and 53% of its suppliers.

Global spend by category (FY2022)



Number of suppliers by category (FY2022)



Location of suppliers

Location is a key consideration when establishing the inherent modern slavery risk of a supplier. SEEK's suppliers are located in around 40 countries with the majority in Australia, Brazil, Mexico and Malaysia. In some of these countries, a lack of government oversight and socio-economic complexities can result in suppliers operating in ways that involve modern slavery.

SEEK has identified countries and regions of particular concern and prioritises due diligence of suppliers operating in these areas.

Modern slavery risk

Tier 1 suppliers

Suppliers within SEEK's primary categories of spend have a low inherent risk of modern slavery and tend to have relatively well-advanced controls. As a result, the majority of SEEK's direct supply chain has a low inherent risk of modern slavery.

SEEK has identified tier 1 suppliers in industries and locations with elevated inherent risks of modern slavery, and has taken steps to further understand and address residual risks associated with these suppliers. This is discussed on page 6.

Tier 2 suppliers and beyond

SEEK recognises that, even in categories of spend considered low risk for modern slavery, risks can exist in the secondary levels of the supply chain.

SEEK has primarily focused on understanding the modern slavery risks associated with its direct suppliers. SEEK includes procurement risk in its inherent risk analysis of tier 1 suppliers. This considers the inherent environmental and social risk of SEEK's tier 2 suppliers.

SEEK will expand its due diligence of tier 2 suppliers during FY2023.

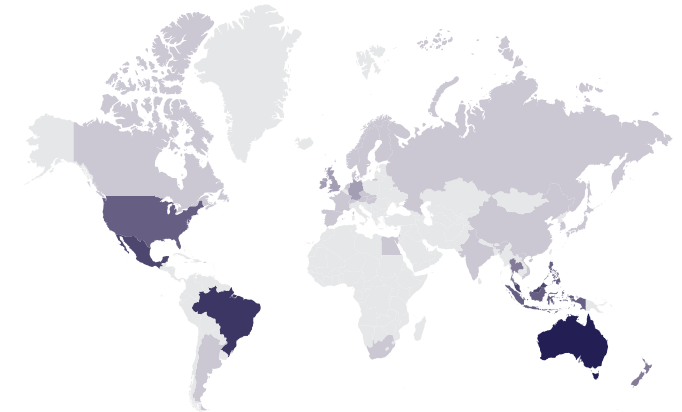
Industries in SEEK's supply chain with elevated modern slavery risk:

Tier 1

- Cleaning
- Security
- Waste
- Hotels and accommodation
- Food and beverage/catering

Tier 2

- Technology (hardware)
- Furniture
- Promotional products
- Apparel
- Office supplies (paper, stationary etc.)



Due diligence and outcomes

During FY2022 SEEK:

- Implemented a consistent, global approach to managing modern slavery risk for new and existing suppliers;
- Engaged EcoVadis as SEEK's third-party business sustainability ratings provider;
- Conducted modern slavery awareness training for procurement teams, contract managers, finance and operations teams; and
- Developed standardised modern slavery contract clauses.

Suppliers engaged by SEEK

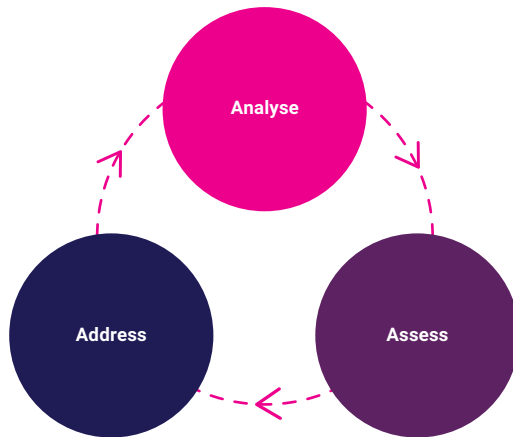
	FY2021	FY2022
Total number of suppliers	2,227	2,616
Number of suppliers that underwent modern slavery inherent risk analysis	1,205	2,397
Number of suppliers found to have elevated risk following modern slavery inherent risk analysis	127	649 ¹
Number of suppliers that have completed a modern slavery risk assessment	53	80
Percentage of suppliers that accepted SEEK's Supplier Code of Conduct (ANZ only)	50%	98%
Number of modern slavery incidents identified in SEEK's supply chain	0	0 ²

1. The increase in suppliers found to have elevated risk for modern slavery is due to:
 - expansion of SEEK's classification of 'elevated risk' to include suppliers with medium risk for modern slavery; and
 - increased scrutiny of SEEK's suppliers in South East Asia, Brazil and Mexico.
2. SEEK conducts media monitoring to identify modern slavery reports and emerging risks relating to its suppliers. SEEK became aware of reports of possible social and human rights abuses within the supply chain of a large multinational corporation which is a supplier to many companies, including SEEK. SEEK contacted the corporation for further information about the reports and to express concern. If the reports are substantiated, SEEK will collaborate with other customers and NGO's to pressure the supplier for remediation.

Supply chain risk framework

SEEK applies a framework across its global operations to identify and address modern slavery risk within its supply chains. This involves a three-step approach and is applied to new and existing suppliers. A range of controls support the implementation of the framework.

Continuous monitoring



Analyse

SEEK partners with EcoVadis to perform enterprise-wide modern slavery risk analysis across SEEK's supply chain. The analysis is based on country of supply, supplier industry and type of goods or services supplied.

Where analysis indicates elevated inherent risk, new suppliers are asked to adopt controls that address this risk in order to progress with the contract negotiation. Existing suppliers with elevated risks progress to the 'assess' stage of the framework.

During FY2022 new suppliers in high-risk industries and 92% of SEEK's existing suppliers were analysed for modern slavery risk.

Assess

SEEK requires the following suppliers to undergo a due diligence assessment to better understand the suppliers' work practices and supply chains in relation to modern slavery:

- suppliers with high inherent risk of modern slavery;
- critical suppliers, based on spend and strategic alignment to SEEK's priorities; and
- suppliers that have had substantiated reports of modern slavery incidents made against them.

Critical suppliers and suppliers accused of modern slavery incidents are referred for assessment through EcoVadis. Non-critical, high-risk suppliers complete a questionnaire, with responses reviewed by SEEK's procurement teams. These teams are trained to identify modern slavery risk.

Both assessments require suppliers to provide evidence of policies, procedures and practices in place that minimise the risk of modern slavery occurring within their operations and supply chains.

If a supplier is not willing to undergo an assessment, SEEK takes proportionate remedial steps which may include contract termination. This has not been required during FY2022.

During FY2022 122 suppliers were prioritised for assessment. Assessment of high-risk and some medium-risk suppliers will continue in FY2023.

Address

If residual risk for modern slavery remains high following the due diligence assessment, SEEK works with the relevant suppliers to address these risks. The engagement can be performed directly by SEEK, or training and guidance can be provided through EcoVadis.

Consistent with SEEK's Supplier Code of Conduct, if a supplier is unable or unwilling to work with SEEK and take satisfactory steps to address gaps in controls, SEEK takes proportionate remedial steps, which may result in contract termination. This has not been necessary during FY2022.

Independent due diligence of SEEK's supply chain risk

During FY2022 SEEK joined the Mekong Club and engaged EcoVadis. These organisations provide independent advice and due diligence of modern slavery risk, supporting the delivery of SEEK's supply chain risk framework.

While SEEK remains accountable for the management and delivery of the framework, the involvement of independent parties provides confidence that the framework is delivered consistently and using substantiated information.

Supply chain risk framework (continued)

→ Key controls supporting SEEK's supply chain risk framework:

Expertise

- Supply Chain Integrity Manager – coordinates modern slavery supply chain activities.
- Modern Slavery Working Group – a team of individuals from each business responsible for day-to-day management of modern slavery risk, collaborating to implement consistent practices to address modern slavery.
- Procurement teams – responsible for identifying elevated modern slavery risk in future spend and implementing appropriate controls.
- Staff training – ongoing program of modern slavery training for procurement teams and contract managers.

Governance

- Procurement Risk Review Checklist – checks that SEEK employees must complete before engaging a supplier, including modern slavery checks.
- Supplier Code of Conduct – standards and practices that SEEK expects suppliers to observe when interacting with SEEK, other organisations and the wider community.
- Modern slavery contract clauses – assurance that suppliers' operations, sub-contractors and supply chains do not contravene modern slavery laws and standards.
- Remediation process – a process (currently in development) that applies to Tier 1 suppliers where modern slavery risk is identified in their supply chains.

Program partners

- EcoVadis – third-party due diligence of suppliers' modern slavery risk and support for performance improvement.
- Mekong Club – advice, training and collaboration supporting companies to address modern slavery risk.
- Media monitoring – through a range of external sources to identify actual or emerging modern slavery risks.

Onboarding new suppliers

SEEK has established an on-boarding process to prevent new suppliers with high residual modern slavery risk becoming part of SEEK's supply chain. Whenever possible, proposed suppliers in high-risk industries are analysed for modern slavery risk prior to contract negotiation. If risk is found to be high, SEEK will work with the supplier to address the risk. If the supplier is not willing to address its risk, an alternative supplier will be selected.

New office

During FY2022 SEEK secured a new office location for a SEEK Asia business.

Based on industry and location, the landlord was found to have high inherent risk for modern slavery and human rights issues.

Prior to contract finalisation SEEK established the following controls with this supplier to mitigate the modern slavery risks:

- landlord agreed in principle to SEEK's Supplier Code of Conduct;
- modern slavery clauses included in contract; and
- landlord agreed to complete a due diligence risk assessment.

SEEK will work closely with this supplier to ensure that the conditions of the contract are met and modern slavery risks minimised.

Effectiveness of actions taken

SEEK measures the effectiveness of its supply chain modern slavery framework based on the metrics set out on page 5.

During FY2022 SEEK reviewed and updated its approach to supply chain due diligence by including a range of new controls, metrics and considerations. While assessing elevated risk suppliers has not progressed as quickly as planned, SEEK is confident that the accuracy, maturity and effectiveness of these assessments has substantially improved.

One of the most effective actions to address modern slavery is to leverage SEEK's buying power to generate change. This is done by clearly communicating SEEK's expectations to its suppliers. This is particularly important for suppliers that operate in countries without effective modern slavery legislation and where consideration of human rights risks is not common in commercial dealings.

Job searching on SEEK's employment marketplaces

Modern slavery risks and controls

SEEK's business model, connecting people with jobs posted by hirers, and SEEK's geographic reach, create inherent risks as outlined below. Alongside these risks comes the opportunity to make SEEK's employment marketplaces the most trusted and legitimate place to find employment. With advanced technology and high job placement market share, SEEK can leverage its unique market position to improve hiring practices. This investment protects human rights and will maintain the integrity of the platforms.

The risks for candidates when job searching online cover a spectrum of poor hiring practices, particularly in Asia. Hirers may post ads for opportunities which involve:

- fraud and scams;
- discrimination;
- workers paying for jobs; or
- forced labour, trafficking and debt bondage.

Across the APAC businesses, SEEK addresses the risks of poor job advertising and hiring practices in a number of ways. This is supported by SEEK's robust approach to cybersecurity and data privacy protection.

Hirer validation

Onboarding checks and ongoing account protection

Job ad template

Helping hirers create quality ads to provide transparency for candidates

Job ad screening

Automated and manual checks and blocking of ads

'Report ad' channels

Encouraging candidates to report suspicious ads

Candidate applies on platform

Supporting candidates to apply safely

Terms and conditions of advertising

Genuine paid employment opportunities

Cybersecurity

Protecting customer data, business data and systems

Data privacy

Transparency about how candidate information is collected, used and managed

Due diligence and outcomes

At SEEK modern slavery due diligence is prioritised based on risk. Each employment platform is assigned a country risk rating based on external data available through the Walk Free 'Modern Slavery Index' and the 'Trafficking in Persons Report' produced by the US State Department.

Local recruitment practices associated with each employment platform contribute to the risk rating, for example overseas recruitment, placement fees and prevalence of recruitment scams. This analysis provides an inherent risk rating for each employment platform and is performed annually. On the basis of this assessment, JobStreet Malaysia and Jora were prioritised for due diligence during FY2022.

JobStreet Malaysia

JobStreet operates employment marketplaces in Malaysia, Philippines, Singapore and Indonesia. JobStreet Malaysia is the largest employment platform in Malaysia. Jobs are directly posted by hirers predominantly for jobs in Malaysia. Job ads are also scraped from external employment websites and other sources in Malaysia and aggregated on JobStreet Malaysia. This is done to provide candidates with the widest range of relevant job opportunities in their location.

Modern slavery risk in Malaysia

Malaysia has a relatively high prevalence of modern slavery and high risks of human trafficking. Reports of modern slavery conditions for Malaysian citizens in local jobs is rare. The modern slavery risks relate to:

- Jobs for inbound foreign workers. Malaysia has a rapidly expanding economy, increasing urbanisation, high educational attainment among nationals and relatively low labour force participation among women. This creates major demand for migrant workers to perform low-paid jobs. The Malaysian labour force of 16.3 million is supplemented by 2-3 million foreign migrant workers.
- Jobs overseas for outbound Malaysians. A small number of people travel for professional jobs outside Malaysia or Singapore. Media are reporting new and emerging bonded labour risks relating to scam job ads for professional roles in Cambodia, Vietnam, Laos and Myanmar.

Modern slavery due diligence

The due diligence was performed in four parts.

1. A detailed assessment of all job ads that appeared during one representative month in 2022. This focused on lower paid jobs in high-risk sectors of manufacturing, construction and agriculture including plantations.

2. Engagement of an external human rights expert to perform an independent assessment of the risk of exposure to modern slavery conditions for candidates using JobStreet Malaysia.
3. Assessment of JobStreet's hirer and job ad screening processes.
4. Monitoring mainstream and social media to identify reports about modern slavery related to online recruitment.

Outcomes of the due diligence assessments

The assessments showed that almost all job ads directly posted on JobStreet are for low risk jobs in Malaysia for resident Malaysians. Recruitment of foreign workers usually involves agents based in the foreign country rather than online job posting. Higher risk job ads for overseas locations outside Malaysia or Singapore comprised around 400 jobs, or 0.4% of total ads for the month reviewed.

Job ads posted directly on JobStreet Malaysia are subject to the processes described on page 9. At onboarding new hirers are screened for business legitimacy and scams. Job ads are screened using an automated 'bad words' list in English, Chinese and Malay to identify discriminatory words and indicators of scams. 80% of the job ads with 'bad words' are manually reviewed by a specialised Ads Quality Control Team which amounted to 6,041 job ads in the month reviewed.



Due diligence and outcomes (continued)

JobStreet Malaysia (continued)

When candidates apply for jobs through the JobStreet platform, warnings appear at the application stage to 'Be alert for advertisements that require you to make payment for application or processing or are too good to be true.' Links provide further information on safe job searching and how to identify and report suspicious ads.

Job ads are scraped from external sources by Jora for auto-inclusion and comprise around half the job ads on JobStreet Malaysia. Candidates are redirected to the original source of a job in order to apply. These ads are mainly for lower income jobs. These job ads present higher risks than direct posted job ads as the hirers engage with an external site and are not onboarded to JobStreet Malaysia. Of the scraped job ads, an average of just over 40% are manually reviewed for discrimination, fraud and scams by JobStreet Malaysia amounting to 17,000 ads per month. In the month reviewed around 11% of the ads reviewed were deactivated.

To protect candidate safety and address modern slavery risks JobStreet Malaysia is:

- No longer posting direct job ads for jobs in high-risk countries outside Malaysia including Vietnam, Cambodia, Myanmar and Laos.
- Assessing whether the risks of overseas recruitment can be adequately addressed for high-risk countries.
- Closely monitoring emerging trends for scams involving deceptive recruitment in South East Asia.
- Reviewing instances of poor hiring practices to improve automated screening processes to block hirers and job ads involving poor hiring practices and scams, with a focus on high risk jobs.
- Strengthening checks when onboarding recruitment agencies.
- Formalising the internal standards for response and remediation where human trafficking or modern slavery is identified.

Modern slavery identified

Multiple articles appeared in mainstream and social media in mid-2022 about an individual who used JobStreet Malaysia and took a job in Cambodia. They were then held in a compound with their passport withheld and forced to conduct scams and internet fraud. The individual had returned to Malaysia before JobStreet was alerted to this incident through media monitoring.

A review showed that the candidate responded to a job ad that appeared legitimate. The job ad was placed through the account of an existing hirer which has now been blocked. JobStreet has communicated with this candidate and warned other candidates who accessed the job ad and other job ads for Cambodia.

The review also identified an increase in job ads for Cambodia during 2022, from a very low base. JobStreet Malaysia has ceased advertising jobs for roles in Cambodia.

Due diligence and outcomes (continued)

Jora

Jora operates within the SEEK business in Australia and has an online presence in 25 countries. Jora aggregates job ads to provide candidates with a single place to find quality jobs within their search criteria. Jora sources job ads from many external job sites, primarily partner job boards and careers listings on large company and government websites. Jora typically redirects candidates to the original source of a job to apply. In some countries hirers can post job ads directly to Jora.

The Jora employment marketplace plays a key role for SEEK in growing ad scale. Jora advertises approximately 7.5 million jobs each month across the countries in which it has an online presence.

Modern slavery risk on Jora

Almost all job ads that appear on Jora are sourced from external job sites. These job ads are created outside Jora and the candidate applies for the job at the original source of the job ad. The modern slavery risk therefore depends on the quality of the original source for the job ad and the verification and screening performed by the original source. Risks also vary with the prevalence of modern slavery across the countries where Jora sources job ads.

Modern slavery due diligence

Modern slavery due diligence during FY2022 involved the following:

1. A strategic country risk assessment of the 36 countries where Jora had an online presence.
2. Assessment of the controls over the job ad aggregation process.

Outcomes of the due diligence assessment

The strategic country risk assessment considered the inherent vulnerability to modern slavery and the effectiveness of the respective government's response to modern slavery in each of the 36 countries in which Jora had an online presence. This identified six countries of elevated modern slavery risk and a further five countries of moderate risk with no further strategic purpose for Jora. Following this assessment, SEEK committed to exiting Jora from those eleven countries. This was achieved by November 2022. SEEK operates no other employment platforms in these countries.

Based on risks of modern slavery in job ads aggregated on its platforms, Jora has closed its online operations in:

- Pakistan
- Myanmar
- Cambodia
- Venezuela
- Laos
- Algeria
- Qatar
- Morocco
- South Africa
- Tunisia
- United Arab Emirates

Jora aims to source job ads from external job sites that offer high quality, relevant job ads in that location. Many external job sites are well-known companies that present low risk. Jora selects the external sources based on assessment of the quality and relevance of the external job site and the job opportunities. This assessment decreases the risks to candidates, including risks of deceptive recruitment.

Job ads on Jora replicate the original job ad on the external source. A 'Report this job ad' channel is placed in each job ad on Jora so that a candidate can notify Jora if something seems suspicious. Any report received through this channel is followed up.

Hirers can post job ads directly on Jora in 12 countries including Australia, New Zealand, and the countries in Asia where SEEK operates JobStreet and JobsDB. Direct job ads are subject to the following controls which reduce risks to candidates.

- Hirers must register an account and are checked for legitimacy.
- Job ads must include mandatory information and evidence that the job is a true paid position for a genuine employer.
- Each job ad is screened for 'bad words'. This automated screening aims to block spam, discriminatory terms and fraudulent job ads.
- Job ads include warnings for candidates.
- A 'Report this job ad' channel is available on each job ad.

An automated filter is applied to externally sourced job ads to identify known banned companies and URLs. Jora will scale up the capability to extend this to screen aggregated job ads.

No reports were received by Jora during FY2022 of candidates encountering deceptive recruitment or modern slavery as a result of identifying a job on the Jora platform.

Effectiveness of actions taken

Tracking progress

The Modern Slavery Program has identified improvements to enable SEEK to better address risks of deceptive recruitment. These improvements have been incorporated into the Fair Hiring Program which is led by SEEK's Chief Executive Officer. SEEK's Risk and Assurance Team supports the Fair Hiring initiative by:

- assessing hirer and job ad screening processes and tracking metrics;
- identifying improvements; and
- recording and tracking agreed actions in the SEEK risk and audit findings database, LogicGate.

Implementation of improvements

Previous Modern Slavery Statements identified improvements to address deceptive recruitment on the employment platforms. These improvements include enhanced candidate protection measures and using leverage with hirers to improve practices. An overview of progress to date follows.

Philippines – Workabroad

- Workabroad has increased the transparency of the jobs so that candidates can better assess their risks.
- Job ad screening is performed manually over all ads which is an average of around 5,000 ads per month. On average just over 100 ads fail the quality checks and are deactivated each month.

Thailand – JobsDB TH

- Hirer validation includes onboarding checks for scams and fraud. Job ad templates and screening are now operating effectively. All jobs identified in automated screening are manually reviewed which is an average of around 11,000 job ads per month.
- The jobs continue to be low risk, predominantly professional placements advertised by corporate hirers.

Indonesia – JobStreet ID

- The business is targeting accelerated market penetration with a focus on the non-corporate market segment. The business has scaled up quality controls and resources to meet increased job ad numbers.
- New hirers are validated at on-boarding.
- All directly posted ads are subject to automated screening. Manual reviews of ads identified in automated screening has increased to over 90%.

Internal reporting

The Fair Hiring Steering Committee receives regular reporting including monthly performance of hirer and job ad screening across SEEK's employment marketplaces. This enables key stakeholders to make informed decisions about what is working and what needs further improvement.

Culture and awareness

To build awareness of modern slavery, SEEK has engaged employees across SEEK, including in countries where unfair hiring practices are accepted as normal. The awareness of SEEK's impacts on human rights has motivated employees and enabled the implementation of fair hiring controls.

Fair hiring

As an organisation that operates to improve millions of working lives, SEEK is uniquely positioned to lead change against poor hiring practices. SEEK is prioritising its program of work on fair hiring in Asia.

The fair hiring program addresses the risks to candidates when engaging with employment marketplaces. Candidates may encounter job ads that involve deceptive recruitment that could result in modern slavery as well as ads that:

- expose them to illegitimate or illegal jobs, for example fraud or migration scams;
- unlawfully charge or fail to disclose placement fees so that the worker pays for a job; or
- discriminate against or disadvantage them.

Since the first SEEK website was launched in 1998, technology and expertise in hirer and job ad screening have evolved. Fair hiring controls and processes have also been implemented across the SEEK Asia platforms. Further improvements will be implemented as part of the move by FY2024 to a single platform through Marketplace Unification.

SEEK's platforms enable ethical recruitment. Quality job ads provide transparency to help candidates better assess job opportunities. SEEK's platforms provide automated tools and guidance for hirers to help them produce quality job ads. To address local risks, SEEK Asia is working to provide candidates with clarity and awareness of their rights, and warnings about known unfair hiring practices, particularly affecting migrant, manual and domestic workers. In some sectors, SEEK can leverage its position to help hirers and recruiters identify and avoid unfair hiring practices. An experienced ethical hiring specialist has been appointed in Asia to further advance SEEK's commitment to fair hiring.

SEEK's processes and systems have been reviewed through the lens of poor hiring practices. This identified various existing controls across SEEK Asia that combat the risks to candidates when job searching on SEEK's employment platforms. The program of work monitors platform vulnerabilities that could be exploited by unscrupulous parties and continues to build capability to screen and block deceptive or discriminatory job ads.

Continued investment in candidate safety will ensure that SEEK's employment platforms are recognised as the most trusted and legitimate. Through collaboration with organisations and experts, SEEK will leverage its unique market position to improve hiring practices across the region to improve working lives.



Governance

Governance of SEEK's modern slavery program

SEEK takes a company-wide approach to modern slavery risk. The modern slavery program is planned on a three-year rolling basis in consultation with senior management at SEEK ANZ, SEEK Asia and the businesses in Latin America.

The Fair Hiring Program is described on page 14 and is overseen by SEEK's Chief Executive Officer. SEEK Asia's Chief Executive Officer and other senior leaders are involved in regular steering meetings as part of this program. An experienced ethical hiring professional has been engaged by the SEEK Asia business to further improve the program.

A Supply Chain Integrity Manager is responsible for coordinating the modern slavery supply chain activities. SEEK uses a due diligence framework, combining data analytics and manual risk analysis activities, to assess modern slavery risk within the global supply chain. SEEK works directly with suppliers with elevated modern slavery risk to remediate these risks, as described on pages 5–7.

SEEK's Chief Financial Officer is accountable for modern slavery reporting, which is the responsibility of the Governance team. SEEK's Board receives reports on the modern slavery program and approves this Statement. The Board oversees the process to verify the integrity of this Statement.

Consultation with SEEK businesses

SEEK manages the ANZ and Asia businesses as one APAC business across which the modern slavery program of work is performed. In addition, SEEK collaborates with relevant employees in Mexico and Brazil in relation to supply chain reviews and fair hiring.

The reviews of the employment platform in Malaysia were performed by corporate and local specialists. SEEK's Chief Risk Officer provided oversight of the review of the employment platforms. These due diligence reviews involved the respective local managers who signed off on the findings and agreed actions.

About this Modern Slavery Statement

This Statement has been prepared in line with the requirements of the Australian *Modern Slavery Act 2018* (Cth). This Statement covers the reporting entity SEEK and its operating subsidiaries and controlled entities for the financial year ended 30 June 2022. This Statement does not cover non-controlled entities or non-operated joint venture operations.

SEEK is listed on the Australian Securities Exchange and headquartered in Melbourne at its registered office at 60 Cremorne Street, Cremorne Victoria 3121 Australia.

This Statement was approved by SEEK's Board and signed by the Chairman.



Graham Goldsmith
Chairman

Dated 17 November 2022

Index to disclosures required by the Modern Slavery Act 2018 (Cth)

Mandatory reporting criteria	Topic heading and location
Identify the reporting entity	About this Modern Slavery Statement: page 15
Describe the reporting entity's structure, operations and supply chains	About SEEK: page 1 SEEK's structure and operations: page 3 SEEK's supply chains: page 4
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: page 3 • Supply chains: page 4 • Job searching on SEEK's employment marketplaces: page 9
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	Due diligence and outcomes – supply chains: page 5–7 Key controls supporting SEEK's supply chain risk framework: page 7 Job searching on SEEK's employment marketplaces – Modern slavery risks and controls: page 9 Due diligence and outcomes – Employment marketplaces: page 10–12 Fair hiring: page 14
Describe how the reporting entity assesses the effectiveness of these actions	Effectiveness of actions taken – Supply chain: page 8 Employment marketplaces: page 13
Describe the process of consultation with any entities the reporting entity owns or controls	Consultation with SEEK businesses: page 15
Any other information that the reporting entity considers relevant	Progress addressing modern slavery: page 2 Governance of SEEK's modern slavery program: page 15



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