



**SEEK**  
Modern Slavery  
Statement 2024



 <b>Overview</b> 2	 <b>Assessing effectiveness</b> 14
 <b>Operations – fair hiring</b> 8	 <b>Governance, consultation and collaboration</b> 16
 <b>Supply chains</b> 11	 <b>Outlook</b> 17

## About 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 2023 to 30 June 2024. Refer to page 17 for an overview of where each of the mandatory criteria have been addressed.

This Statement includes JobAdder (a controlled business of SEEK) for modern slavery supply chain reporting. Management will report on modern slavery risks for JobAdder’s operations in future statements.

In FY2024, SEEK sold its Latin American businesses, Brasil Online (Brazil) and OCC (Mexico). This Statement includes these businesses, except where noted.

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.

## Terms used in this Statement

**ANZ** means the online employment marketplaces operating in Australia and New Zealand under the brand SEEK.

**APAC** means the online employment marketplaces in ANZ and Asia.

**Asia** means the online employment marketplaces operating in South East Asia and Hong Kong under the brands Jobstreet and Jobsdb.

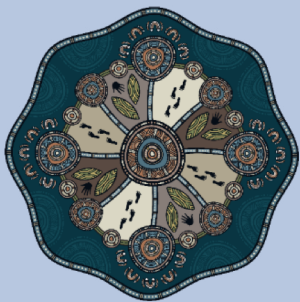
**JobAdder** is a business owned by SEEK that streamlines the recruitment process for recruiters and talent acquisition teams through the provision of Applicant Tracking System (ATS) and Customer Relationship Management offerings.

**Jora** means the single search engine owned and operated by SEEK under the brand of Jora that combines directly posted ads and aggregated ads from many different sources and locations.

**Platform Unification** refers to the program that unified the APAC employment marketplaces onto one online product and technology platform.

**SEEK** means SEEK Limited and its owned and controlled entities.

**WorkAbroad** is an online employment marketplace focused on providing aspiring Filipino migrant workers with job opportunities that have been verified by the Philippine Government.



## Acknowledgement of Country

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

We acknowledge Australia’s Aboriginal and Torres Strait Islander peoples as Australia’s First Peoples, paying respects to their rich cultures, to their Elders past, present and future, and 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 peoples.

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

Artist: Bitja, Dixon Patten Jnr  
Gunnai, Gunditjmarra, Yorta Yorta and Dhudhuroa, Bayila Creative

# 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 2024.

Addressing modern slavery risk across our business is a major part of our commitment to having a positive impact on the communities in which we operate. We welcome the opportunity every year to report on our progress in this area.

Our first priority is to do whatever we can to minimise the risk that our platform is used to facilitate unethical and illegal hiring employment practices, including modern slavery. In addition, we aspire to use our leading market positions to raise awareness of modern slavery risks and promote responsible activity.

Our fair hiring program, which aims to prevent exploitative recruitment and modern slavery on SEEK's employment platform, is well established.

It was enhanced this year by the completion of our Platform Unification program. We now have a single product platform throughout our core Asia Pacific markets, and have already extended screening controls of hirers and job ads to our Asia marketplaces. We have also started ongoing due diligence assessments of the unified employment marketplace platform to ensure compliance with local regulations.

In our supply chains, we continued modern slavery audits and transitioned to a new third-party platform to deliver supplier risk assessments.

We have made pleasing progress this year. But risks always evolve, and our work in this area will never be completed. We have high aspirations, and will continue to invest significant resources and encourage cooperation from suppliers, customers and other stakeholders to tackle modern slavery as a collective effort.

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

**Ian Narev**  
Managing Director and Chief Executive Officer

## FY2024 highlights

### Operations – fair hiring

Automatically scanned **100% of direct and indirect job ads (4.9 million ads)** across APAC post Platform Unification. Approximately 10% of job ads were escalated for manual review (487,000 job ads).

Excluded more than **1,400 hirers** during onboarding as a result of high-risk indicators, closed **170 hirer accounts** due to identified fraud/scam or other high-risk activity and removed more than **1,200 job ads** following manual review or verified customer complaints (representing approximately 1% of new hirers and less than 1% of job ads respectively).

Expanded **ANZ controls for hirer onboarding and job ad screening** to Asia as part of the Platform Unification program, resulting in improved ability to detect and remove scam ads and illegitimate hirers.

Expanded use of AI tools to review all **aggregated job ads for scams and discrimination**.

Expanded **detailed due diligence** over direct job ads in Asia for jobs in high-risk countries.

Expanded the **Trust and Safety** team to support increased focus on fair hiring.

Participated 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.

### Supply chains

**Analysed more than 2,400 suppliers** for modern slavery risk, representing 91% of SEEK's suppliers.

Transitioned to a **new third-party platform**, Fair Supply, to deliver ongoing supply chain risk assessments.

Strengthened supplier onboarding processes to reduce the possibility of engaging a supplier with high modern slavery risk.

Continued to conduct **modern slavery audits** on SEEK's cleaning suppliers and support **audited suppliers** to improve practices.

Continued employee **modern slavery training** program.

# About SEEK

## Our purpose

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

- Operates market-leading online employment marketplaces in Australia, New Zealand and across South East Asia.
- Focused on providing people with all the job opportunities relevant to them and enabling organisations 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.

Approximately

**40m**  
candidate  
relationships

Approximately

**400k**  
hirer  
relationships

Approximately

**500m**  
population  
exposure



The SEEK Annual Report, Sustainability Report, Climate Statement and Modern Slavery Statement are available at: [www.seek.com.au/about/investors](http://www.seek.com.au/about/investors)

# 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 the Asia Pacific region.

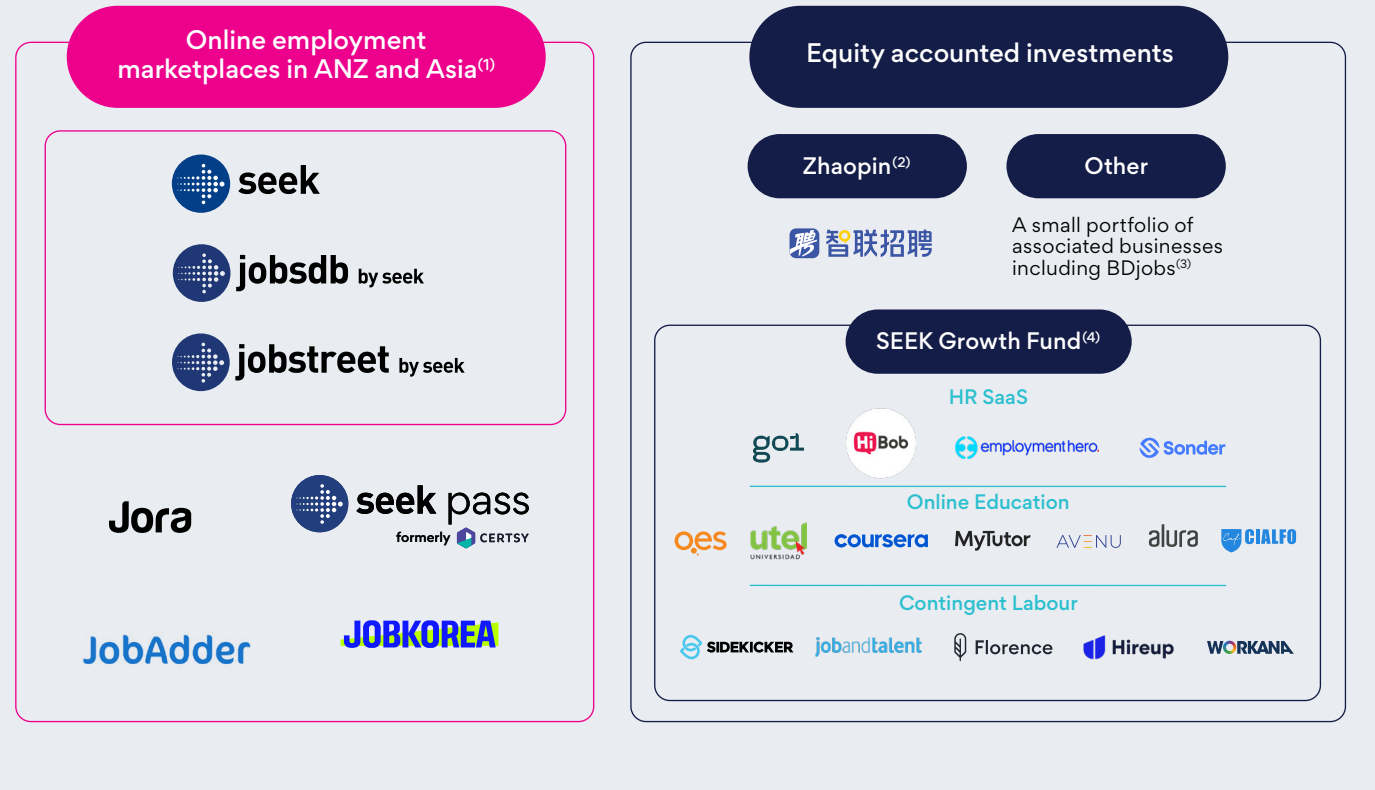
SEEK Limited is the ultimate parent company of the SEEK structure and is the only reporting entity under the *Modern Slavery Act 2018 (Cth)*.

The Asia Pacific 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 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 high-growth 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.

In June 2024, SEEK completed the sale of its 100% interest in Brasil Online Holdings and its subsidiaries (together 'Brasil Online') and its 98.2% interest in OCC. This Statement includes relevant data for these entities, except where noted.

## Overview of SEEK's structure



(1) Online employment marketplaces comprise ANZ, Asia and Corporate costs segments. SEEK's ownership in JobKorea (headquartered in Seoul, South Korea) is 10.0%.

(2) SEEK's equity accounted ownership in Beijing Wangpin Consulting Co. Ltd (Zhaopin) (headquartered in Beijing, China) is 23.5%.

(3) SEEK's equity accounted ownership in BDJobs (headquartered in Dhaka, Bangladesh) is 37.0%.

(4) SEEK's equity accounted ownership in the Fund is 83.8%. SEEK does not control the Fund.

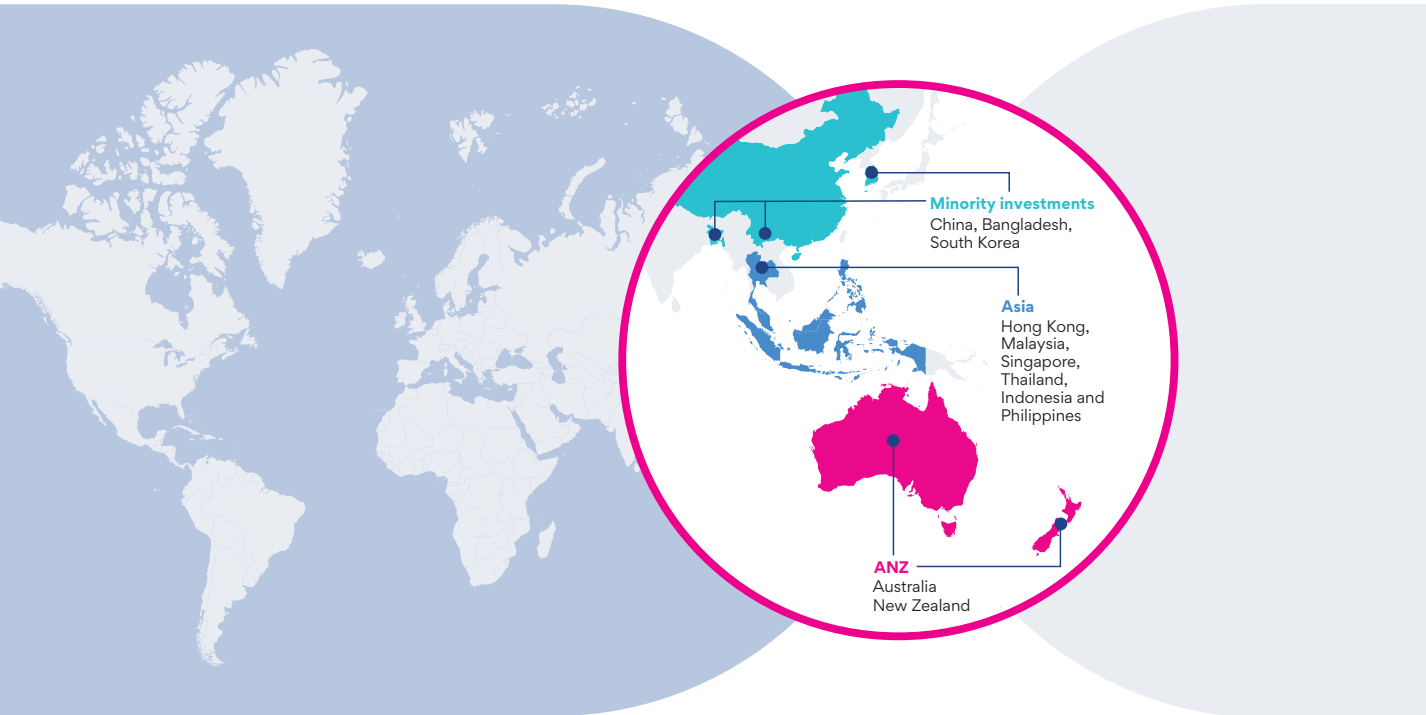
## Structure, operations and supply chains (continued)

### Operations

#### Online employment marketplaces

SEEK facilitates the matching of people 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 people with relevant, personalised job opportunities and enable organisations to fill vacancies and streamline their recruitment processes.

In January 2024 SEEK completed a multi-year program to unify its APAC employment marketplaces onto one online product and technology platform. The unified platform enables new products to be deployed rapidly at scale across all markets, creating efficiencies and improving reliability and security.



#### SEEK's workforce

SEEK employs a professional workforce in a hybrid-working model.

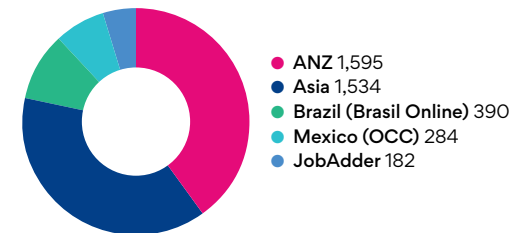
As at the end of FY2024, SEEK's APAC workforce comprised 3,129 employees, with a roughly equal distribution across the region. Most employees were employed permanently, with 4% employed on either a fixed-term or casual basis. Full-time employees accounted for 96% of the workforce, with part-time employees comprising 4%.

SEEK also operated businesses in Brazil and Mexico in FY2024, until their sale in June 2024, under the Brasil Online and OCC brands respectively. The Brasil Online business comprised 390 employees and the OCC business 284 employees.

JobAdder comprised 182 employees as at the end of FY2024.

SEEK maintains a contingent workforce of contractors and business partners to provide flexible access to specialised skills and short-term capabilities. This workforce supplements, as required, the delivery of business-critical programs, such as the recently completed Platform Unification program.

#### SEEK's workforce FY2024



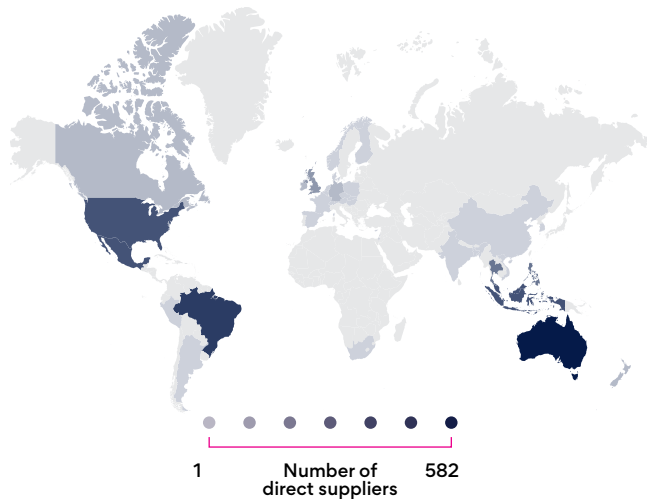
## Structure, operations and supply chains (continued)

### Supply chains

During FY2024 SEEK's total value of spend with suppliers was estimated A\$350m, comprising over 2,600 suppliers located in approximately 40 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), business services and marketing. During FY2024, these represented approximately 80% of SEEK's global procurement spend and 65% of its suppliers.



As an Australian-headquartered business, 65% of SEEK's FY2024 spend was with Australian suppliers. The majority of the remaining spend was with suppliers located in South East Asia and Latin America, reflecting the regions in which SEEK operated in FY2024.

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

Spend category	Description	Key sourcing countries	Percentage of FY2024 spend
<b>Technology</b> (software and support services)	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.	Australia, USA, Brazil	30%
<b>Business services</b>	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.	Australia, Malaysia, Indonesia	28%
<b>Marketing</b>	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.	Australia, Singapore, Malaysia	22%
<b>Facilities</b>	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).	Australia, Indonesia, Philippines	11%
<b>Other</b>	• IT hardware and peripherals; • business travel; • office supplies; • food and beverage; and • other operations equipment.	Australia, Malaysia, Hong Kong	9%

# Modern slavery risks

Human rights is a material Environmental, Social and Governance (ESG) topic for SEEK given the various human rights impacts of job seeking, particularly in Asia, as well as modern slavery risks within SEEK's supply chains. SEEK is focused on implementing strategies to prevent exploitative recruitment and modern slavery on its employment platform and to identify and manage risks in its supply chains.

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

	Risk description and impact	Mitigating strategies	Type of potential impact <sup>(1)</sup>
<b>Operations – online employment marketplaces</b>	<p>SEEK's online employment marketplaces facilitate the matching of people and organisations to create job placements. There is a risk that SEEK's employment marketplaces are used to advertise job ads by illegitimate or fake hirers to coerce candidates into situations of modern slavery.</p> <p>Hirers include small and medium enterprises, corporates, government bodies and recruitment firms. Hirers may post job ads for opportunities which involve:</p> <ul style="list-style-type: none"> <li>• illegal or illegitimate jobs;</li> <li>• deceptive recruitment leading to modern slavery;</li> <li>• workers paying for jobs; or</li> <li>• discrimination</li> </ul> <p>This risk is particularly prevalent in Asia.</p>	<p>SEEK has a fair hiring program that is designed to prevent exploitative recruitment and modern slavery on its employment platform.</p> <p>Information on the processes and controls in the fair hiring program, and the risk assessment that is used as part of this program is set out on pages 8 to 10.</p>	Contribute
<b>Supply chains</b>	<p><b>Tier 1 suppliers</b></p> <p>Direct suppliers in SEEK's principal categories of spend tend to have a low inherent risk of modern slavery and relatively well-advanced controls. As a result, the majority of SEEK's direct suppliers have relatively low modern slavery risk. SEEK engages with some suppliers that have elevated modern slavery risk, due to the industries and locations in which they operate.</p> <ul style="list-style-type: none"> <li>• Industries: there is potential for SEEK to contribute to modern slavery through cleaning services, recruitment agencies and hospitality suppliers.</li> <li>• Locations: countries with high prevalence of modern slavery where SEEK directly engages suppliers include Indonesia, Philippines, India, Slovakia, Bangladesh and Peru.</li> </ul> <p><b>Tier 2 suppliers and beyond</b></p> <p>SEEK recognises that even when engaging directly with suppliers considered low risk for modern slavery, risks can exist in the direct suppliers' supply chains (secondary levels of supply chain). Industries of particular concern to SEEK are construction, technology (hardware), furniture, office supplies and promotional products.</p>	<p>SEEK applies its Supply Chain Risk Framework to identify and address modern slavery risk within its supply chains. Information on the Supply Chain Risk Framework and the controls that support this is set out on pages 11 to 13.</p>	<p>Tier 1 suppliers: Contribute</p> <p>Tier 2 suppliers: Directly linked</p>
<b>Operations – workforce</b>	<p>The risk that SEEK's office operations directly result in modern slavery practices is low due to the composition and location of the workforce.</p> <p>People who work for SEEK are employed directly and are predominantly on permanent contracts in professional roles, with 4% employed on a fixed-term or casual basis.</p> <p>SEEK maintains a contingent workforce of contractors and business partners to provide access to specialised skills and short-term capabilities on a flexible basis. The majority of these workers are skilled workers.</p>	<p>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.</p> <p>For contingent workers, SEEK's procurement processes apply, and external providers are required to adhere to the Supplier Code of Conduct.</p>	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).



## Operations – fair hiring

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

As a leader in employment marketplaces across Asia Pacific, SEEK is uniquely positioned to lead change against unfair hiring practices. SEEK operates its platform in a manner that supports ethical recruitment and its focus is to create marketplaces with 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 adapts its fair hiring policies and processes to reflect emerging trends, any incidents that have been identified and key incident themes. For example, there has been an increase in 'pig butchering' scams, particularly in Asia. These involve scammers offering jobs to candidates that appear to be legitimate, however, the candidates are then forced to work in scamming call centres. Other trends include scammers imitating SEEK and contacting candidates through SMS, messaging apps and social media platforms and an increase in the use and sophistication of AI from illegitimate hirers.

In response to these emerging trends, SEEK conducts additional due diligence on hirers that exhibit high-risk behaviours consistent with current trends and reports; communicates job searching advice and tips on these types of scams to candidates; raises awareness with employees; and is expanding the use of AI to continue to protect candidates.

Continued investment in candidate safety aims to ensure that SEEK's employment platform is recognised as trusted and legitimate.

### 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.

During FY2024, over 25,000 job ads were reported by candidates suspecting fraud or scams through both formal and informal channels. Examples of actions taken by SEEK in response include the following:

- SEEK identified a hirer through the screening process in the Philippines for further review. Upon investigation, the overseas hirer was found to have contract terms requesting that the candidate sign a loan agreement to cover their travel costs. As a result, SEEK removed this hirer from the platform. This action was taken before any reports were made by candidates.
- SEEK identified an article referencing a group of companies linked to human trafficking in the commercial scamming industry in South East Asia. SEEK undertook further due diligence and searched related organisations across its Asian marketplaces. As a result, SEEK removed related hirers from the platform and continues to monitor for any further action required.
- SEEK was alerted that a hirer in Malaysia was attempting to engage with candidates via social media and not through the SEEK platform application process. Attempts to contact the hirer were unanswered, resulting in a hirer due diligence and risk assessment being conducted. The hirer was assessed as high-risk and removed from the platform.
- SEEK's internal controls detected a 'bulk email' from a hirer in the Philippines to hundreds of candidates. The email requested candidates to contact the hirer via social media and engage in communication off platform. The bulk emails were automatically blocked by SEEK due to the unusually large volume. After completion of due diligence and risk assessment, the hirer was assessed as high-risk and removed from the platform.



## Operations – fair hiring (continued)

### Fair hiring program

SEEK's fair hiring program includes the following key components:

#### Hirer and job ad screening

#### Employment platform due diligence

#### Terms and conditions of advertising

#### Job ad posting process

#### 'Report ad' channels

#### Candidate security measures

#### Raising awareness, job searching advice and engagement

#### Hirer and job ad screening

SEEK's Trust and Safety team operates detailed checks and procedures to ensure hirers are legitimate and job ads on SEEK's platform are genuine. In FY2024, hirer and job ad screening was enhanced through the unified platform. As a result, hirer and job ad screening is now done consistently across APAC in the following four ways:

- manual and automated reviews that check for features of known inappropriate activity when a hirer registers;
- multi-factor authentication controls for registered hirers posting job ads;
- automatic scanning of proposed job ads, based on known risks and 'bad word' lists leading to job ads being blocked or flagged for manual review when elevated risk is detected; and
- simulation of job applications to build the Trust and Safety team's understanding of fraudulent activity.

Platform Unification enabled SEEK to automatically scan 100% of direct and indirect job ads across APAC (4.9m job ads). Approximately 10% of those ads were escalated for manual review by the Trust and Safety team. Where appropriate, hirers were educated on how to improve the content of their ads to eliminate discriminatory terms, or ads were blocked where they contravened SEEK's Terms and Conditions.

Candidates are also able to identify and report a hirer should its off-platform communications not align with the original job ad. These reports allow SEEK to respond to high-risk hirers appropriately.

Other SEEK businesses also operate similar checks and procedures to ensure hirers are legitimate and job ads are genuine. Both Jora and Jobstreet Express (a mobile-focused platform for selected lower wage roles) proactively monitor reporting on hirers and job ads to support identification of suspicious activity. The WorkAbroad business requires Philippine Government approval as a form of verification of hirers.

#### Employment platform due diligence

SEEK reviews the modern slavery profile in each country in which it operates its employment platform. Modern slavery employment platform due diligence is prioritised based on risk. Each employment marketplace is assigned a country risk rating based on external data available through the Walk Free Global Slavery Index 2023 and the Trafficking in Persons Report, produced annually 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. This analysis provides an inherent risk rating for each employment marketplace and is performed annually. Since FY2022, SEEK has completed due diligence assessments of its Jobstreet Malaysia and Singapore, Jobsdb Hong Kong and Jora businesses to ensure ongoing compliance with local regulations.

#### Terms and conditions of advertising

SEEK is committed to ensuring that all job ads on its employment platform are for legitimate job opportunities and that job searching is safe and secure. A key condition of advertising on SEEK's platform is that the job ad is a genuine, paid employment opportunity.

#### Job ad posting process

SEEK's job ad posting process is designed to help hirers adopt fair hiring practices. SEEK's platform provides automated tools and recommendations to help hirers produce informative job ads while avoiding discriminatory or otherwise offensive content.

#### 'Report ad' channels

The 'Report this job ad' feature on the SEEK platform and customer service channels enables candidates to directly report suspicious job ads to SEEK for investigation.

## Operations – fair hiring (continued)

### Candidate security measures

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 in Australia are also encouraged to use the free platform, SEEK Pass (formerly Certsy) to verify claims made in job applications without having to directly share sensitive personal documents. SEEK Pass will be rolled out across APAC in FY2025.

➔ [Refer to SEEK Pass](#)

### Raising awareness, job searching advice and engagement

SEEK has processes in place to raise candidates' awareness of their rights and provides information on its platform about known unfair hiring practices.

Advice on safe job searching is provided and updated on SEEK's platform on how candidates can identify signs of job scams and as other threats emerge. In FY2024, an updated Security and Privacy Hub was launched for SEEK's customers. The 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.

➔ [Refer to Security and Privacy Hub](#)

SEEK collaborates with non-government organisations and experts on fair hiring initiatives and priorities. In late 2023, 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. SEEK also reports potential instances of modern slavery to local authorities.

### Employee training program

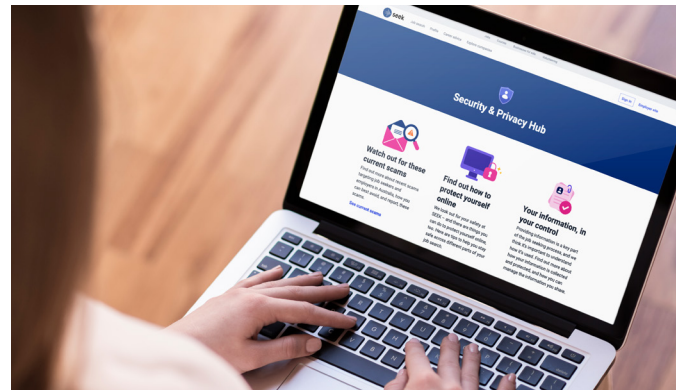
During FY2024, SEEK continued its employee training program to increase employee awareness of fair hiring. The training included fair hiring principles, common forms of modern slavery across APAC, how crime syndicates are involved with modern slavery, what SEEK is doing to keep its platform safe and case studies on high-risk situations. The training was provided to the SEEK Sales teams and Product and AI teams focused on data analytics.

In addition, an internal fair hiring improvement program focuses on the continued upskilling of SEEK's Trust and Safety team. The training focuses on job ad process simulations. 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 from 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.

### Fair hiring risk assessments

SEEK's fair hiring risk assessments are conducted in line with SEEK's Risk Management Framework. They are used to measure the risk (to candidates and SEEK) of breaches of fair hiring practices in each country that SEEK operates.

Risk assessments are also used when identifying and assessing suspicious hirers and deciding what action to take.



### WorkAbroad Philippines

WorkAbroad is an online employment marketplace focused on providing aspiring Filipino migrant workers with job opportunities that have been verified by the Philippine Government.

Key activities and improvements in FY2024 included the following:

- Creating a free hirer verification tool for candidates to verify contact information of licensed recruitment firms. This was created following reports of fraudulent hirers using WorkAbroad's name to build trust with candidates. It is available to any licensed recruitment firm from the Philippines.
- Engaging with the Department of Migrant Workers regarding protection of Filipino workers in overseas employment.
- Continuing to increase transparency of job ads on the WorkAbroad platform by reducing the reposting of job ads by agency hirers and reducing time to remove ads that do not meet SEEK's standards.
- Continuing job ad screening across all ads.

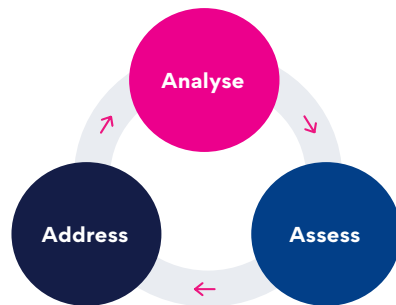
WorkAbroad is undergoing a technology rebuild that is expected to be finalised in FY2025. After the updated WorkAbroad platform is launched, WorkAbroad is looking to help overseas hirers understand the rules and regulations for hiring Filipinos and connect overseas hirers to licensed Philippines-based agencies.

# 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. A range of controls support the operation of the framework, which are set out on page 12.



### Analyse

SEEK partners with a third-party platform, Fair Supply<sup>(1)</sup>, 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.

Suppliers with elevated inherent risk are progressed to the 'assess' stage of the framework.

During FY2024, 91%<sup>(2)</sup> of SEEK's suppliers were analysed for modern slavery risk. All suppliers are re-analysed for modern slavery risk every six months.

- (1) Fair Supply is an Australian based ESG risk management and compliance platform. It uses internationally recognised data sets to quantify supply chain risk.
- (2) The remaining 9% of suppliers are contingent workers who are self-employed. SEEK is not able to analyse the modern slavery risk of contingent workers. These workers contract directly with SEEK to deliver highly skilled work and therefore risk of modern slavery is low.
- (3) This methodology is managed by the Procurement team and was developed in consultation with Fair Supply and SEEK's Risk and Assurance team.
- (4) Pace of assessments in FY2024 was slower than anticipated due to SEEK transitioning to a new third-party risk management platform during the year. It is expected that the rate of supplier assessments will increase during FY2025.

## Analysis methodology

Fair Supply's supply chain risk analysis is performed using supply chain data from 190 countries and in relation to more than 15,000 industry sectors. Risk is quantified using a range of economic and human rights standards including: The United Nations' System of National Accounts; the Walk Free Global Slavery Index and International Labour Organisation Global Estimates of Modern Slavery.

The results of this process, and SEEK's spend data, are used to quantify the estimated number of people in forced labour per million dollars spent with each supplier, as well as a modern slavery risk profile down to tier 10 of the supply chain.

An elevated risk supplier means a supplier that has high or medium-high inherent risk of modern slavery taking place in its operations or supply chains. SEEK considers a supplier to have elevated risk if:

- 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<sup>(3)</sup>.

In FY2024, 580 suppliers (22% of SEEK's total suppliers) met this threshold and were therefore considered to have elevated inherent modern slavery risk.

### Assess

SEEK requires the following types of suppliers to undergo a due diligence assessment so SEEK can better understand their work practices and supply chains in relation to modern slavery:

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

These criteria are applied to both existing and potential suppliers.

Suppliers are required to complete a questionnaire, with suppliers receiving a residual risk score based on their responses.

Suppliers from high-risk industries, such as cleaning and security, 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.

Both the questionnaire and audit require suppliers to provide evidence of policies, procedures, controls and practices they have in place to minimise the risk of modern slavery occurring within their operations and supply chains.

If a supplier is not willing to undergo an assessment or audit, SEEK takes proportionate remedial steps, which may include contract termination. During FY2024, one supplier was terminated as it refused to participate in a modern slavery audit.

To date, 31%<sup>(4)</sup> of SEEK's elevated risk suppliers have been assessed for residual modern slavery risk (FY2023: 9%). Assessment of suppliers will continue in FY2025.

### 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 a third party.

Potential suppliers that are found to have high residual risk for modern slavery after completing the assessment are required to develop controls that address these risks before they can progress to contract negotiation. If a potential supplier is not willing to do this, then the contract will not progress.

Consistent with SEEK's Supplier Code of Conduct and Modern Slavery Remediation Strategy, if an existing supplier is unable or unwilling to work with SEEK and take satisfactory steps to address gaps in controls, SEEK may take proportionate remedial steps, which may result in contract termination.

## Supply chains (continued)

### Key controls supporting SEEK's Supply Chain Risk Framework

#### Expertise

- Procurement team – includes roles dedicated to delivering and monitoring the Supply Chain Risk Framework and implementing appropriate controls.
- Employee training – ongoing program of modern slavery training for all employees.

#### Governance

- Procurement Risk Review Checklist – steps that SEEK employees must complete before engaging a supplier, including modern slavery checks.
- Procurement ESG Playbook – guidance on how and when modern slavery controls should be included in SEEK's procurement processes, including mandatory questions for potential suppliers and evaluation score weightings.
- 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.
- 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 Remediation Strategy – formalises SEEK's response to any incident, or suspected incident, of modern slavery occurring within its supply chain, aligned with SEEK's Risk Management Framework.
- Grievance mechanism – SEEK's whistleblower channels provide a safe way for its employees, suppliers, contractors and other stakeholders to report non-compliance and illegal or unethical practices without fear of reprisal.
- Supplier guidance materials - SEEK provides a range of materials to support suppliers to meet SEEK's modern slavery standards and improve their approach to addressing modern slavery risk.

#### Partnerships

- 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.

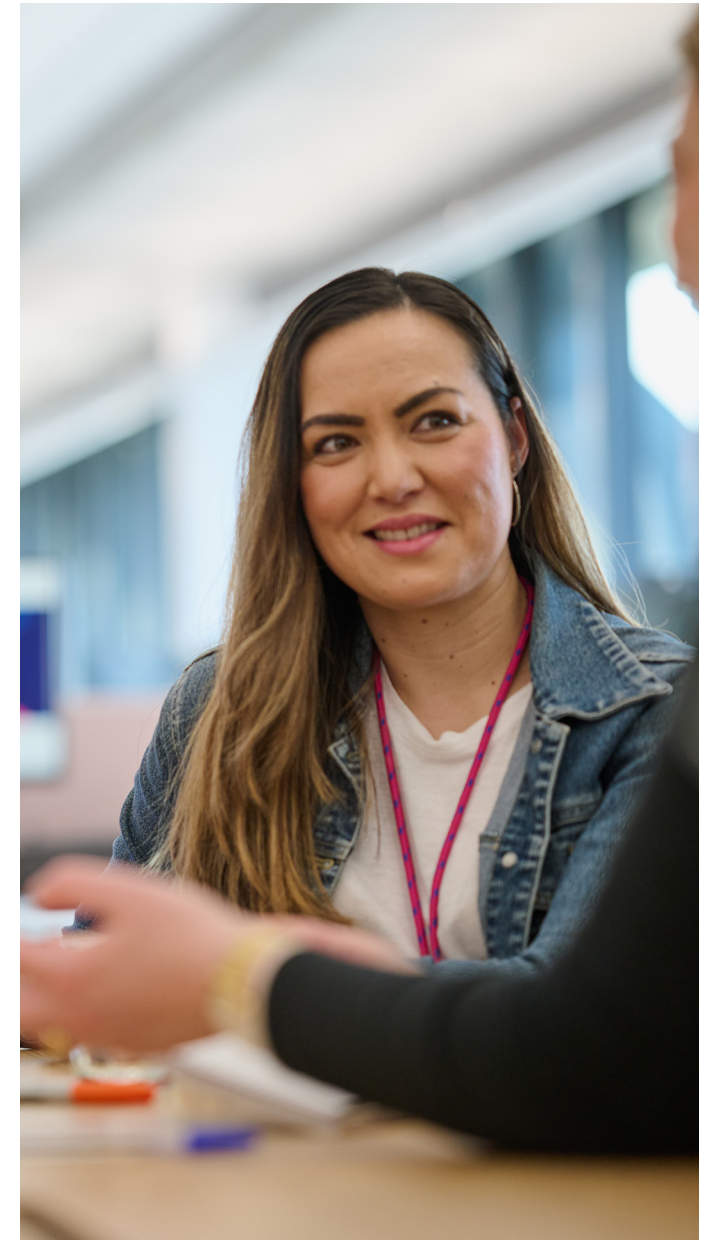
### Tier 2 suppliers

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 provider may have an elevated risk of modern slavery.

During FY2024, SEEK expanded its understanding of modern slavery risk in tier 2 and beyond of its supply chain by engaging Fair Supply to conduct a modern slavery risk analysis of its supply chain. The economic flow of products and services was modelled down SEEK's supply chain, from tier 1 suppliers to tier 2 suppliers, tier 2 suppliers to tier 3 suppliers, down to tier 10.

The review has shown that SEEK's greatest level of risk is with its direct suppliers. This is due to significant direct spend with suppliers in high-risk countries.

Particular industries of risk are hospitality, construction, computer and trade services. SEEK manages its indirect suppliers risks with supplier assessment processes that require suppliers to answer a range of questions relating to the due diligence of their own supply chains.



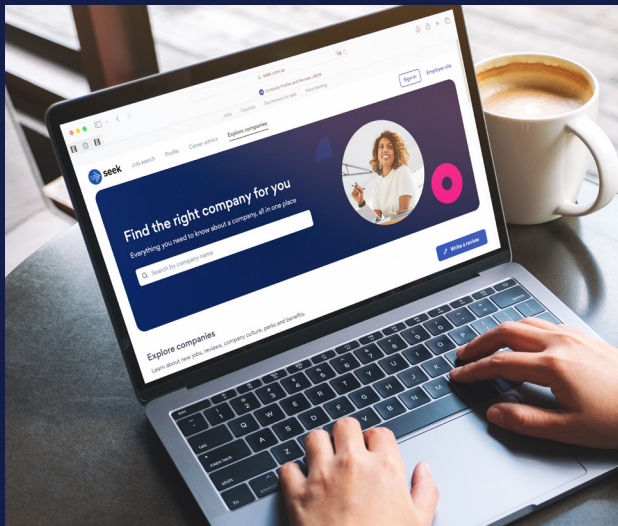
## Supply chains (continued)

### Modern slavery and IT hardware

During FY2024, SEEK undertook a project to centralise its sourcing of laptops. IT hardware is high risk for modern slavery due to manufacturing and mining often taking place in countries associated with weak labour laws, large populations of migrant workers or well-documented cases of modern slavery taking place.

Because of this, SEEK placed an increased focus on modern slavery risk and the controls each respondent had in place to address risk in its supply chains. Modern slavery was included as a 15% weighting in the overall evaluation score for each supplier. Responses ranged from companies having little to no controls and oversight to those that audited and remediated their own high-risk suppliers.

Whilst this sourcing activity is currently ongoing, the focus on modern slavery risk and controls has impacted the vendors shortlisted in the process.



### Cleaning audits – investigating and addressing poor practices in SEEK’s supply chain

Withholding of wages, immigration-related coercion and threats, and sub-standard working conditions are all examples of modern slavery that have been observed in the cleaning industry in the majority of countries in which SEEK operates.

During FY2024, SEEK audited a further seven of its cleaning contractors for modern slavery risk. The audits were conducted by an independent third-party specialist in modern slavery auditing. The audits consisted of an on-site review of the contractors’ governance processes and face-to-face interviews with their employees when required. Findings were anonymised and reported back to SEEK.

One of the providers of cleaning services declined to participate in the audit. As a result, SEEK terminated the supplier’s contract. Of the contractors audited, four were found to be operating in ways that did not meet SEEK’s expectations.

SEEK initiated its Modern Slavery Remediation Strategy with each of these suppliers and worked with them to develop a remediation plan that would result in all SEEK’s concerns being addressed within a strict timeline. None of the issues identified through the audits were directly linked to modern slavery. However, if left unresolved, they could have led to the contractors’ employees being negatively impacted.

All four suppliers were receptive to the process and committed to delivering on their remediation plans. Two of the suppliers are currently working to address the issues identified; however, two suppliers were unable to deliver on the remediation plans as they could not provide evidence that the identified issues had been resolved in the time required. SEEK has decided to terminate its contracts with these suppliers.

During FY2024, SEEK also worked closely with four suppliers that required remediation following its FY2023 cleaning audits. Three of these suppliers were able to deliver their remediation plans and continue to be engaged by SEEK. One supplier was unable to meet SEEK’s requirements as they were not able to modify their practices to a standard that met SEEK’s requirements. Their contract was therefore terminated.

SEEK now requires all new cleaning contractors to be audited prior to engagement. During FY2025 SEEK will audit its remaining cleaning suppliers and re-audit the suppliers that required remediation during FY2024.

# Assessing effectiveness

## Operations – fair hiring

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

- 1 Implementing controls and processes to manage fair hiring risks; and
- 2 Identifying and implementing continuous improvements to better address risks of deceptive recruitment.

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 9 to 10 of the Statement 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.

SEEK will continue to consider which measures of effectiveness are most appropriate to ensure areas for improvement are identified and any required changes to adapt to the changing external environment and emerging trends are implemented.

## Controls and processes

SEEK measures the effectiveness of its fair hiring controls and processes based on the metrics set out below.

Metric <sup>(1)</sup>	FY2024	FY2023
Effectiveness of hirer and job ad screening (APAC) <sup>(2)</sup>	<ul style="list-style-type: none"> <li>Automatically scanned 100% of direct and indirect job ads across SEEK's unified platform (4.9m job ads)</li> <li>Approximately 10% of job ads escalated for manual review (487,000 job ads)</li> </ul>	<ul style="list-style-type: none"> <li>Automatically scanned 100% of direct job ads on SEEK platform across APAC (7.8m direct job ads)</li> <li>Approximately 10% of job ads escalated for manual review (780,000 job ads)</li> </ul>
Hirers <ul style="list-style-type: none"> <li>Total number of hirers deactivated due to failed onboarding process assessment<sup>(3)</sup></li> <li>Total number of hirers deactivated due to fraud/scam or other high-risk activity</li> </ul>	<ul style="list-style-type: none"> <li>1,419 (representing approximately 1% of hirers)</li> <li>170 (representing less than 1% of new hirers)</li> </ul>	<ul style="list-style-type: none"> <li>1,909 (representing approximately 1% of hirers)</li> <li>350 (representing less than 1% of new hirers)</li> </ul>
Job ads <ul style="list-style-type: none"> <li>Total number of high-risk job ads removed after the completion of investigation for suspected fraud or non-compliance with SEEK's Terms and Conditions</li> <li>Total number of job ads reported by candidates regarding fraud or scams</li> </ul>	<ul style="list-style-type: none"> <li>1,232 job ads removed following manual review or verified customer complaints (representing less than 1% of job ads)</li> <li>25,657 job ads</li> </ul>	<ul style="list-style-type: none"> <li>2,879 job ads removed following manual review or verified customer complaints (representing less than 1% of job ads)</li> <li>Not reported in FY2023</li> </ul>
Candidate trust (ANZ) <sup>(4)</sup>	<p>Most trustworthy:</p> <ul style="list-style-type: none"> <li>Australia: 4.6x lead on the nearest competitor</li> <li>New Zealand: 3.0x lead on the nearest competitor</li> </ul>	<p>Most trustworthy:</p> <ul style="list-style-type: none"> <li>Australia: 4.5x lead on the nearest competitor</li> <li>New Zealand: 3.3x lead on the nearest competitor</li> </ul>

## 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 FY2024 focused on the activity enabled by Platform Unification, including:

- expanding ANZ controls for hirer onboarding and job ad screening to Asia, resulting in improved ability to detect and remove scam ads and illegitimate hirers (the percentage of direct and indirect job ads being screened increased to 100% post Platform Unification);
- expanding detailed due diligence over direct job ads in Asia for jobs in high-risk countries;
- expanding the use of AI tools to review all aggregated job ads for scams and discrimination; and
- rolling out the job ad scanning tool (SIFT) to Asia to enhance scam and fraud detection.

SEEK's Trust and Safety team in Asia has also expanded to meet the increased requirements from Platform Unification and support focus on fair hiring.

SEEK is measuring the effectiveness of the improvements enabled by Platform Unification. The metrics indicate an improvement in the speed of verifying hirers and new job ads and a decrease in the number of job ads removed from the platform (compared to the first half of FY2024). This decrease in job ads removed is due in part to improved controls during the onboarding of new hirers and new job ads and quality control processes enabled by the unified platform.

(1) This table excludes JobAdder, Brasil Online and the OCC businesses.

(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%.

(3) Prior to Platform Unification, independent hirer deactivation processes ran in Asia and ANZ. Post Platform Unification, processes evolved into a single process across APAC.

(4) Based on independent research conducted by Nature (a market research agency) on behalf of SEEK for CY2023.

## Assessing effectiveness (continued)

### Supply chains

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

- 1 Delivering SEEK's Supply Chain Risk Framework across its supply chains;
- 2 Supporting suppliers with high residual risk to improve their processes; and
- 3 Implementing continuous improvement to SEEK's due diligence processes.

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	FY2024	FY2023 <sup>(1)</sup>
Number of suppliers analysed for modern slavery risk	2,437 (representing 91% of SEEK's suppliers)	2,112 (representing 83% of SEEK's suppliers)
Number of suppliers found to have elevated risk following modern slavery inherent risk analysis	580 (representing 22% of SEEK's total suppliers)	580 (representing 23% of SEEK's total suppliers)
Number of elevated risk suppliers that have completed a modern slavery risk assessment	182 (representing 31% of SEEK's elevated risk suppliers)	55 (representing 9% of SEEK's elevated risk suppliers)
Number of suppliers not meeting SEEK's Supplier Code of Conduct requirements <sup>(2)</sup>	4 (representing 2% of assessed elevated risk suppliers)	4 (representing 7% of assessed elevated risk suppliers)
Number of modern slavery related incidents identified in SEEK's supply chain	0	0

(1) FY2023 excludes JobAdder as it was not in the Statement scope in FY2023.

(2) In FY2023 and FY2024, SEEK audited its cleaning contractors for modern slavery risk. Further detail on SEEK's action in response to these audits can be found on page 13.

#### Supporting suppliers with high 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.

	FY2024	FY2023 <sup>(1)</sup>
Number of suppliers with high residual risk following assessment or audit	4	4
Number of high-risk suppliers agreeing to undergo remediation	4	4

(1) FY2023 excludes JobAdder as it was not in the Statement scope in FY2023.

#### Continuous improvement of supply chain due diligence processes

SEEK is continuously aiming to enhance existing processes and develop new ones 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 FY2024, SEEK improved its supply chain due diligence processes by:

- developing a clear, quantifiable definition for 'elevated risk';
- transitioning to a new third-party platform to conduct modern slavery analysis and assessments;
- engaging a new auditor to conduct modern slavery audits;
- expanding supplier onboarding checks across APAC; and
- including modern slavery risk as a required weighting for all procurement tenders.

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



# Governance, consultation and collaboration

## Governance

The Board, through the Audit and Risk Management Committee (ARMC), is responsible for oversight and management of material risks, including modern slavery and fair hiring.

The fair hiring program is led by the CEO and is overseen by the Fair Hiring Steering Committee. Fair hiring metrics are tracked and reported to management via quarterly committee meetings. The committee reviews the operational performance of SEEK's controls across SEEK's employment marketplaces.

The Procurement team is responsible for co-ordinating the modern slavery supply chain activities, including the application of the Supply Chain Risk Framework. Supply chain metrics are tracked and reported to management via the Third-Party Risk Management Forum meetings and the Procurement Bi-monthly Report.

SEEK's Risk and Assurance team supports the fair hiring and modern slavery programs by: assessing the control effectiveness of hirer and job ad screening processes; tracking operational metrics; identifying areas for improvement; co-ordinating the Fair Hiring Steering Committee; and recording and tracking agreed actions related to modern slavery risks. Due diligence reviews of the employment platform are performed by SEEK's Risk and Assurance team with oversight by the Chief Risk Officer. These reviews are focused on the inherent risks of modern slavery in the local employment marketplaces and the residual risks based on the jobs advertised on SEEK's platform.

SEEK's CFO is accountable for modern slavery reporting, which is the responsibility of the SEEK Governance, ESG and Compliance team. The information in this Statement is validated by subject matter experts and senior management and is supported by verifiable evidence.

## Grievance mechanism

SEEK's whistleblower channels are a key mechanism for reporting illegal or unethical practices, including modern slavery grievances, and is available to all SEEK's employees, suppliers, contractors and other stakeholders. 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. The Whistleblower Protection Policy encourages employees and stakeholders to report concerns of wrongdoing.

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

On SEEK's platform, candidates can report any suspicious job ad via the 'Report this job ad' link. SEEK reviews all reported job ads for compliance and high-risk factors, and appropriate action is taken based on that review.

## Consultation with SEEK's owned and controlled entities

The fair hiring and modern slavery programs of work are managed across APAC. Consultation occurs across SEEK-owned and controlled entities and across functions including Procurement, Risk and Assurance, Governance, Finance and operational areas.

SEEK consults with senior management and relevant employees at its owned and controlled business JobAdder (and at Brasil Online and OCC prior to the sale of these businesses) in relation to supply chain reviews and fair hiring. These businesses have their own procurement, legal and risk functions and work with SEEK to develop oversight of their modern slavery risks. In FY2024, a working group with JobAdder representatives was established to focus on integrating JobAdder into SEEK's sustainability reporting, including in relation to modern slavery.

## Collaboration and engagement

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

Stakeholder collaboration and engagement continues to evolve as the fair hiring and modern slavery supply chain programs mature.

As part of its fair hiring program, SEEK shares learnings on modern slavery risks with stakeholders across its employment marketplaces. Fair hiring engagement has included:

- information for candidates about their rights and how to protect themselves during the recruitment process;
- encouraging hirers to post quality job ads providing transparency for candidates;
- training for key teams and interested employees;
- participation in APAC regional forums relating to fair hiring; and
- collaboration with non-government organisations and experts to partner on initiatives and identify priorities.

As part of its modern slavery supply chain program, SEEK is involved in a number of professional networks that meet regularly to discuss sustainability topics including modern slavery. This includes a network of sustainability procurement professionals across the technology industry.

SEEK will continue to identify opportunities to collaborate and engage more broadly on its modern slavery programs of work.

# Outlook

## Operations – fair hiring

SEEK continues to review its processes with a focus on due diligence of hirers to increase the safety and legitimacy of its employment platform. Future activities will include:

- implementing further process improvements through the identification of trends and signals of fraudulent and illegitimate hirers;
- continuing to expand the use of AI and machine learning to enhance scam and fraud detection and prevention capabilities;
- building further capability in the Trust and Safety team to support increased focus on fair hiring;
- improving real-time monitoring and fair hiring reporting;
- continuing the employee fair hiring training program;
- exploring collaboration and partnership opportunities with third parties including not-for-profit organisations; and
- providing more detailed updates to the Board on the progress of the fair hiring program.

## Supply chain

SEEK continues to develop its approach to due diligence of indirect (tier 2) suppliers and to work with suppliers. Future activities will include:

- continuing to assess and audit SEEK’s elevated-risk suppliers;
- working with suppliers to address issues identified in assessments and audits, including re-auditing contractors as required;
- increasing supplier capability in relation to managing modern slavery risk;
- continuing to undertake due diligence of indirect (tier 2) suppliers;
- continuing to expand the employee modern slavery training program; and
- providing more detailed updates to the Board on the progress of the modern slavery program.

## 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	About this Statement: page 1 Structure, operations and supply chains – Structure: page 4
Describe the reporting entity’s structure, operations and supply chains	Structure, operations and supply chains: pages 4 to 6
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 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	Operations – fair hiring: pages 8 to 10 Supply chains: pages 11 to 13
Describe how the reporting entity assesses the effectiveness of these actions	Assessing effectiveness: pages 14 to 15
Describe the process of consultation with any entities the reporting entity owns or controls	Governance, consultation and collaboration – Consultation with SEEK’s owned and controlled entities: page 16
Any other information that the reporting entity considers relevant	Governance, consultation and collaboration – Governance; Grievance mechanism; and Collaboration and engagement: page 16 Outlook: page 17

This Statement was approved by the Board of SEEK in their capacity as principal governing body of SEEK Limited on 14 October 2024.



**Graham Goldsmith**  
Chairman  
Dated 14 October 2024



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