



Michael Page International (Australia) Pty Ltd
Modern Slavery Statement





Modern Slavery Statement

Michael Page International (Australia) Pty Ltd's (**Michael Page Australia**) purpose is to change lives through creating opportunity for people to reach their potential by bringing the world's best employers and the brightest professionals together. We are fully committed to preventing acts of modern slavery and human trafficking from occurring within our business and supply chain.

We expect our people, our suppliers, and their employees, whether permanent or temporary, to be treated with respect and dignity at work. At Michael Page Australia, we believe employment should always be chosen; there must be no forced, bonded, or involuntary labour. Employees must not be required to lodge monies or identity papers to be able to work and must be free to choose to leave employment.

This statement has been prepared by Michael Page Australia to meet the requirements of the *Modern Slavery Act 2018* (Cth). It covers the period 1 January to 31 December 2021 and explains the work we have undertaken to address modern slavery risks within our business and the steps we intend to take over the coming year.



Background

Modern slavery is a global issue which can affect any business in any sector and is often very difficult to detect. We recognise, and take very seriously, the risk of modern slavery in our business and our people are committed to taking steps to reduce this risk within our business and supply chain.

Our structure and operations

Michael Page International (Australia) Pty Ltd ACN 58 002 872 264 is an Australian Proprietary Company, limited by shares that specialises in recruitment consultancy in Australia. We have over 35 years of experience and approximately 300 employees in Australia, with annual revenue of approximately \$100 million.

PageGroup plc is the ultimate holding entity of Michael Page Australia. The PageGroup group of companies' trades under the core brands of PAGEGROUP, PAGE EXECUTIVE, MICHAEL PAGE, PAGE PERSONNEL and PAGE OUTSOURCING. Michael Page Australia does not own or control any other entity.

Our registered office is at Level 21, 9-13 Castlereagh Street, Sydney NSW 2000. We specialise in mid-to senior-level professional and management recruitment for permanent, temporary, and contract roles as well as for office and administrative workers for both the private and public sector.



Our supply chains and risks of modern slavery practices

As an Australian provider of professional recruitment services, we consider our supply chain to be relatively simple in comparison to many other industries, as we are not directly involved in overseas labour or manufacturing.

We work with a small range of suppliers who provide goods and services across several different categories. We recognise there is risk of Michael Page Australia being indirectly linked to modern slavery, as our suppliers may source products or raw materials from overseas companies connected with modern slavery.

Michael Page Australia is focused on the recruitment of mid to senior level roles, rather than low skilled labour. As part of our business, we have direct control over the sourcing and supplying of temporary personnel to clients. We recognise that across Australia, temporary workers face higher risks of exploitation and may be more likely to be subject to modern slavery practices.

Our supply chain includes the third-party services provided to Michael Page Australia directly by supply of goods, facilities services, and professional services. We engage various Australian-based providers to provide cleaning, waste management and maintenance services to our Australian offices. While the labour provided by our suppliers is sourced in Australia, we recognise that cleaning, waste management and maintenance services are high risk sectors. By engaging these services through a third party we may be indirectly contributing to modern slavery practices.

In addition, products used by our suppliers may be sourced both in Australia and overseas. It is possible that some of our supplier's products, or their components, may be sourced from countries and industries where there is some risk of being linked with modern slavery.

Michael Page Australia considers there is a relatively low risk of causing, or contributing to, modern slavery in its operations and supply chains.



Actions to assess and address the risks of modern slavery

We conduct risk assessments on our supply chains on an ongoing basis. At the time of preparing this statement, we consider there is a relatively low risk of labour exploitation or other forms of modern slavery and human trafficking occurring within it.

We are assessing and addressing the risk of modern slavery practices occurring within both our business and our supply chain by taking the following actions:



Our policies

All employees of Michael Page Australia are required to comply with the Employee Code of Conduct (**Employee Code**). The Employee Code makes clear that Michael Page Australia will not tolerate, engage in, or support the use of forced labour.

Michael Page Australia's third parties, consultants and contractors who provide goods and services to or on behalf of the company are required to comply with our Supplier Code of Conduct (**Supplier Code**). The Supplier Code reflects the company's commitment to acting ethically and with integrity in its business dealings and relationships.

The Employee and Supplier Codes also reflect an effort to implement and enforce effective systems and controls to ensure modern slavery and human trafficking is not taking place within our business and supply chain.

Michael Page Australia also has in place a Speak Up (Whistleblowing) Policy to assist with the prevention of modern slavery and human trafficking and provides our people a mechanism to speak freely about our practices and raise any concerns. Michael Page Australia is receptive to feedback and dedicated to improvement.



Due diligence

Within our own business

Michael Page Australia prohibits the use of all forms of forced labour and any form of human trafficking. Michael Page Australia has in place several procedures to proactively manage risk, including robust recruitment processes in line with Australian employment laws. Michael Page Australia also provides an external confidential whistleblowing helpline which employees are encouraged to use to report any concerns.

Key activities we have undertaken during the previous reporting period include:

- (a) updating our modern slavery questionnaire;
- (b) delivering modern slavery awareness training;
- (c) taking steps to ensure our people are receiving employment entitlements in accordance with applicable industrial instruments;
- (d) providing safe working conditions for our people by ensuring compliance with work health and safety obligations;
- (e) identifying modern slavery risks and mitigations through our risk management process; and
- (f) conducting internal audits across our business to ensure our actions are implemented and effective.

In recognition of the risks associated with temporary workers, we have implemented an additional system of checks and procedures to help ensure temporary workers are protected from the risks of modern slavery, which include:

- (a) verifying temporary workers have a right to work in Australia for the duration of their assignment, by asking the individual to produce relevant identity documentation. A delay in providing proof of identity and/or associated right to work documentation might indicate a modern slavery issue and is escalated within the business as required;
- (b) conducting detailed reference checks to ensure individuals are hired in a role they are qualified to undertake;
- (c) conducting detailed background checks;
- (d) reviewing contracts to ensure they comply with all legal requirements regarding workers' rights;

Due diligence

- (e) ensuring temporary workers have a bank account in their own name into which their remuneration is paid; and
- (f) reviewing modern awards and industrial instruments to ensure temporary workers are paid correctly.

Within our supply chain

We are committed to partnering with suppliers that share our view and stance on modern slavery. As part of our global initiative we have undertaken the following due diligence procedures with respect to our suppliers:

- (a) conducted initial reviews of all new and existing suppliers to evaluate modern slavery risks within their operations and supply chains;
- (b) mapped our suppliers who provide goods and services to our business to identify those whose goods and services are dependent on labour;
- (c) assessed suppliers within Australia, Asia Pacific and the United Kingdom who we believed operated in high risk areas and wrote to each of them to express our commitment to transparency and combatting modern slavery within our business; ensuring they understood we have similar expectations for our suppliers;
- (d) provided suppliers identified as high risk our Supplier Code of Conduct and requested signed confirmation from those suppliers that they will adhere to our standards;
- (e) conducted a review of our supplier contracts; and
- (f) developed a formal process for business consultation.

Through our approach, we intend to identify and assess the potential risk areas in our supply chain in relation to modern slavery and human trafficking. We then act to mitigate these risks through the implementation of effective actions and controls. From here, we monitor existing risks, the effectiveness of our mitigations and review our operations and suppliers to identify any emerging risks.



Audit and compliance

Over the last reporting period, Michael Page Australia has evaluated the nature and extent of its exposure to the risk of modern slavery occurring in its business and supply chain through internal audits and working with our local procurement teams. This ensures our organisation has robust and effective processes. This evaluation process will continue on an annual basis.

Our core business is focused on the provision of recruitment services in respect of professionals, office and administrative workers, rather than the agriculture, retail or manufacturing sectors, which are sectors we perceive to present a higher risk of labour exploitation



Further steps

Over the next year, we intend to take the following steps in relation to modern slavery and human trafficking during the course of the 2022 reporting period:

- (a) conducting reviews of all relevant policies and procedures;
- (b) approving and circulating all relevant policies and procedures;
- (c) promulgating avenues for customers and workers to report incidents and make whistleblowing complaints;
- (d) implementing an audit and monitoring program as part of our standard internal audit program;
- (e) following our risk management process to ensure we are continually reviewing modern slavery risks within our operations and supply chain and undertaking further evaluation based on risk;
- (f) further implementation of an incident management process;
- (g) delivery of new and reviewed modern slavery awareness training targeting all key stakeholders and employees;
- (h) providing training material to suppliers and partners on identifying modern slavery risks within their operations or supply chains; and
- (i) inclusion of modern slavery clauses in terms of business requiring suppliers of Michael Page Australia to identify, assess and address modern slavery practices and take action if a supplier becomes aware of any modern slavery practices in its operations or supply chain.



Assessing the effectiveness of our actions

To assess the effectiveness of our actions we:

- (a) conduct external audits of our suppliers, to ensure compliance with the Supplier Code, identify any modern slavery risks and assess the effectiveness of the actions implemented to mitigate the risks of modern slavery;
- (b) conduct internal audits across our business to ensure our actions are implemented and effective;
- (c) conduct reviews of our risk management process on an annual basis, as well as identify any changes to modern slavery risks that have been identified and take steps to determine how risks are best addressed;
- (d) conduct annual senior management reviews at Board level to assess the actions we have taken to mitigate the risk of modern slavery;
- (e) keep a record of the actions taken by Michael Page Australia and suppliers; and
- (f) track the percentage of our staff who have completed modern awareness training.

This statement is made pursuant to section 16 of the *Modern Slavery Act 2018* (Cth) and has been reviewed and approved by the Board of Michael Page Australia on 29 June 2022.

MICHAEL PAGE INTERNATIONAL (AUSTRALIA) PTY LTD

Sharmini Wainwright
Senior Managing Director
29 June 2022

David George
Senior Managing Director
29 June 2022