



**SEEK
Modern Slavery
Statement 2023**

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 2023.

This statement is part of our commitment to have a positive impact on the communities in which we operate. We consider this commitment to be central to our purpose, and an important part of our continuous focus on creating long-term value for all our stakeholders. We welcome this opportunity every year to report on our progress.

Our fair hiring and modern slavery programs are well established and included clear goals for the 2023 financial year. These included screening hirers and job ads on SEEK's platforms, conducting modern slavery audits and completing due diligence assessments of our employment platforms in Hong Kong and Singapore. Our progress against these goals and others is clear in the Statement.

We have high aspirations in this area and will never consider the work to be completed. We will continue to rely on the hard work of our people, and cooperation from suppliers, customers and other stakeholders. I would like to thank everyone who has played a role in the activities described in this Statement.

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

Ian Narev

Managing Director and Chief Executive Officer

Terms used in this Statement

APAC means the businesses operating in SEEK ANZ and SEEK Asia.

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.

Fair hiring is the program to prevent exploitative recruitment and modern slavery on SEEK's employment marketplaces.

Jora means the Jora branded online employment marketplace with a presence in 25 countries.

Platform Unification refers to the program to unify the APAC employment marketplaces onto one online product and technology platform by the end of FY2024.

SEEK means SEEK Limited (ABN 46 080 075 314), a consolidated entity consisting of SEEK Limited and its owned and controlled entities.

SEEK ANZ means the SEEK businesses operating in Australia and New Zealand under the brand SEEK.

SEEK Asia means the online employment marketplaces operating in South East Asia and Hong Kong under the brands JobStreet and JobsDB.

SEEK Growth Fund or **the Fund** is a unit trust that operates independently of SEEK. The SEEK Growth Fund owns a number of investments and Early-Stage Ventures and manages certain SEEK assets.

Statement means this Modern Slavery Statement.

Supply chain means the network of individuals, organisations, resources, activities and technologies involved in the creation and sale of a product or service.



Acknowledgement of Country

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

SEEK respectfully acknowledges the Traditional Custodians 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.

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 spanning Australia, New Zealand, Hong Kong, South East Asia, Brazil and Mexico. In addition, SEEK has minority investments in China, South Korea and a number of other countries.

Leverages unique data and technology to create innovative solutions and insights into the future of work.

Protects customers' privacy and uses data ethically.

Employs 3,700+ people across Australia, New Zealand, Asia and Latin America.

ASX listed with headquarters in Melbourne, Victoria.

Approximately **60m** candidate relationships

Approximately **450k** hirer relationships

Approximately **900m** population exposure



Brands owned and managed by SEEK

SEEK ANZ



Brasil Online



SEEK Asia



OCC



Platform support



Sources of more information about SEEK



2023 Sustainability Report



2023 Annual Report

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

Introduction

SEEK is driven by a commitment to its purpose and to having a positive impact on people and the communities in which it operates. As part of this commitment, SEEK continues to take significant steps to identify and address any links between its employment marketplace operations and supply chains and modern slavery.

Human rights is a material Environmental, Social and Governance (ESG) topic for SEEK. SEEK focuses on mitigating material fair hiring and modern slavery risks associated with job advertising and supply chains, particularly in Asia. SEEK also looks for opportunities to use its unique position to influence employment market practices.

The aim of the fair hiring program is to prevent exploitative recruitment and modern slavery on SEEK's employment platforms. The aim of the modern slavery program is to identify and manage risks existing in SEEK's supply chains including both direct and indirect suppliers.

The nature and extent of modern slavery around the world means no company's operations or supply chains are immune to modern slavery risk. 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 FY2023, SEEK's ongoing due diligence program examined this risk in relation to SEEK's employment marketplaces in Singapore and Hong Kong. SEEK's fair hiring program is ensuring progress is made on its commitment to safe and responsible job advertising. Further information about this program of work is available in the 2023 Sustainability Report.

SEEK engages over 2,500 direct suppliers located in more than 35 countries. SEEK is committed to maintaining and improving systems and processes to identify and mitigate modern slavery risks in its supply chain. 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 continuous focus for SEEK. SEEK embraces the opportunity to help safeguard human rights in its supply chains and operations in employment marketplaces.



Introduction (continued)

FY2023 highlights

- Completed due diligence assessment of Hong Kong and Singapore employment platforms
- Performed risk assessment on job ads on SEEK Asia platforms for jobs in high-risk countries
- Completed detailed controls review of hirer onboarding and job ad screening
- Updated SEEK's Supplier Code of Conduct
- Commenced modern slavery audits of SEEK's cleaning contractors
- Established SEEK's Modern Slavery Remediation Strategy

Progress on addressing modern slavery

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

Current foundations

- Methodology to assess the risk of deceptive recruitment on employment platforms.
- Due diligence assessments of the SEEK Asia employment platforms in the Philippines, Thailand, Indonesia, Malaysia, Singapore, Hong Kong and the Jora business.
- Ongoing improvements to hirer and job ad screening, with a focus on deceptive recruitment risk, emerging scams and leveraging technology that will be available through the unification of SEEK's ANZ and Asian online employment platforms.
- Collaboration with businesses, governments, non-government organisations and industry groups to improve SEEK's approaches to modern slavery risk.
- A framework to assess and address modern slavery risk in SEEK's supply chains.
- Ongoing engagement, management and third-party due diligence of SEEK's suppliers.
- Audits of high-risk tier 1 suppliers, starting with SEEK's cleaning services.
- Employee training as part of the fair hiring and strategic sourcing programs.

On the horizon

- Review of fair hiring controls after delivery of the program to unify SEEK's ANZ and Asian online employment platforms.
- Due diligence assessments of the employment marketplaces in Mexico and Brazil.
- Ongoing engagement with key non-profit and industry partners in the fair hiring program.
- Ongoing review of relevant metrics and targets to measure SEEK's performance.
- Modern slavery training for SEEK's suppliers.
- Expand due diligence of tier 2 suppliers.

United Nations Guiding Principles on Business and Human Rights

SEEK's approach to assessing and addressing modern slavery risk aligns with the United Nations Guiding Principles on Business and Human Rights. The technology and the employment marketplaces SEEK operates in expose the business to a unique set of human rights risks; SEEK's attention is directed to those areas that present the most risk.

This is achieved through a range of policies and processes aimed at prevention, mitigation and remediation of risks to human rights. These policies and processes are detailed throughout this Statement.

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, Mexico and Brazil.

SEEK has committed to a large-scale Platform Unification program to combine the APAC employment marketplaces onto one online product and technology platform by the end of FY2024. The unified platform will enable scale efficiencies, rapid innovation and improved reliability and security.

Statement scope and boundary

This Statement addresses the requirements of the *Modern Slavery Act 2018 (Cth)* associated with the business activities of the entities owned, operated and controlled by SEEK Limited. SEEK Limited's operations and activities, over which it has operational control, include the following entities.

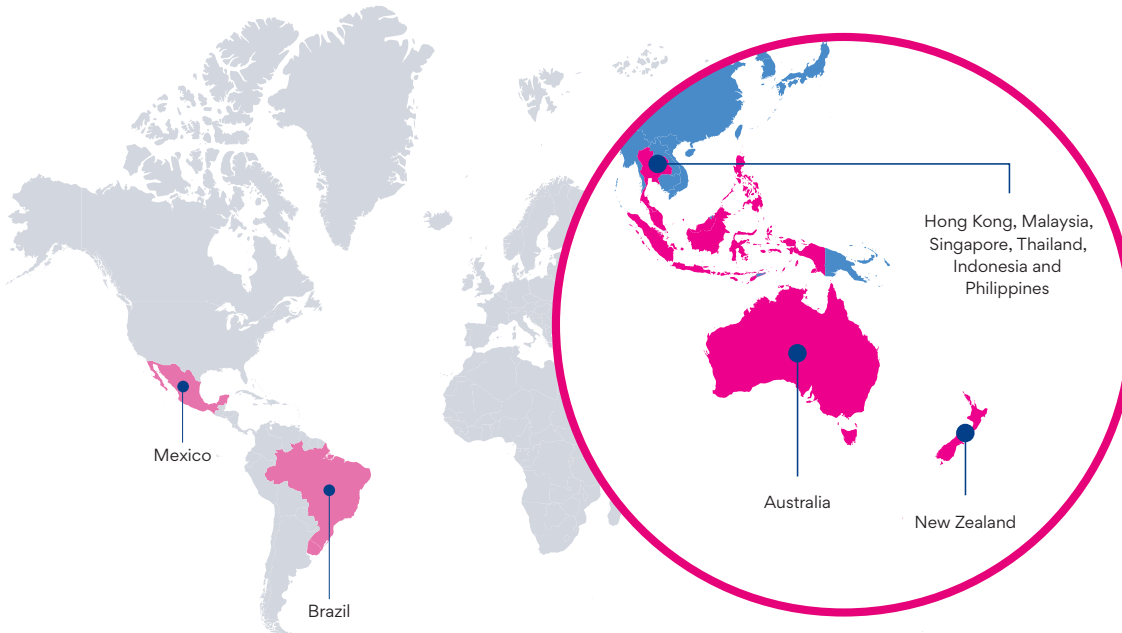
Businesses	Country of operation
SEEK, Jora, Certsy	Australia
SEEK	New Zealand
JobStreet	Malaysia
JobStreet	Indonesia
JobStreet	Singapore
JobStreet, WorkAbroad	The Philippines
JobsDB	Thailand
JobsDB	Hong Kong
OCCMundial (OCC)	Mexico
Catho Online	Brazil

This Statement excludes investments held by SEEK Limited that are not under its operational control, including the SEEK Growth Fund. It also excludes assets owned by SEEK and managed by the Fund such as JobAdder and Zhaopin and portfolio assets owned by the Fund such as Online Education Services.

This Statement covers the period 1 July 2022 to 30 June 2023, which aligns with SEEK's financial year.

SEEK's location of employees (permanent, fixed-term and casual)

The risk that SEEK's office 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 are predominantly on permanent contracts in professional roles.



SEEK's workforce

Australia	1,565
Malaysia	685
Brazil	423
Mexico	283
Indonesia	250
Hong Kong	182
Philippines	170
Thailand	107
Singapore	62
New Zealand	47
Total	3,774

As at 30 June 2023

SEEK's modern slavery risk

SEEK's employment marketplaces (operations)

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. The advertising of jobs increases SEEK's exposure to modern slavery risk, in the event it unknowingly enables the advertising of job ads for opportunities that could result in forced labour, trafficking or debt bondage.

Supply chains

SEEK's supply chains consist of over 2,500 suppliers across more than 35 countries. SEEK's primary categories of spend are business services, technology (software and support services) and marketing, which have low modern slavery risk. Modern slavery risks exist in smaller categories of spend, such as cleaning and hospitality, and secondary levels of SEEK's supply chains.

SEEK's employment marketplaces (operations): fair hiring

SEEK's fair hiring purpose is to prevent exploitative recruitment and modern slavery.

As a leader in employment marketplaces across APAC, SEEK is well positioned to lead change against unfair hiring practices. SEEK's platforms support 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.

SEEK's focus is to create marketplaces with job ads that are free from:

- illegitimate or illegal jobs, for example roles in scamming call centres or investment scams;
- unlawful charges or placement fees where the worker pays for a job; and
- discriminatory language or requirements.

During FY2023, SEEK continued to improve its technology and expertise in hirer verification and job ad screening. These improvements are being applied across the ANZ and Asia employment platforms through standardised processes. Further improvements will be implemented as part of the move by FY2024 to a single platform through Platform Unification.

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

During FY2023, SEEK:

- Screened hirers and job ads on SEEK's platforms.
- Completed detailed risk assessment of direct job ads on SEEK Asia platforms in high-risk countries, resulting in additional due diligence of job ads relating to 14 high-risk countries.
- Completed detailed control reviews of hirer onboarding and job ad screening, resulting in an improved ability to detect and remove scam ads.
- Completed due diligence assessments of employment platforms in Hong Kong and Singapore to ensure ongoing compliance with local regulation.
- Commenced an employee fair hiring training program across APAC.

Modern slavery risks and controls

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 and/or, held for ransom; or
- forced labour, trafficking and debt bondage.

SEEK's processes and systems are regularly reviewed on an ongoing basis to assess their effectiveness at identifying poor hiring practices.

The fair hiring 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.

Fair hiring controls and processes have been implemented across SEEK's employment platforms.

Key processes for fair hiring validations and checks include the following key components, which SEEK continues to improve over time across its businesses.

Hirer validation	Job ad template
Onboarding checks and ongoing account protection	Helping hirers create quality ads to provide transparency for candidates
Job ad screening	'Report ad' channels
Automated and manual checks and blocking of ads	Encouraging candidates to report suspicious ads
Candidate applies on platform	Terms and conditions of advertising
Supporting candidates to apply safely	Genuine paid employment opportunities
Cybersecurity	
Protecting customer data, business data and systems	
Data privacy	
Transparency about how candidate information is collected, used and managed	

SEEK's employment marketplaces (operations): fair hiring (continued)

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 approach to cybersecurity and data privacy protection.

To address local risks, SEEK Asia is working to provide candidates with awareness of their rights and warnings about known unfair hiring practices, particularly affecting migrant workers and high-risk sectors. In some sectors, SEEK can leverage its position to help hirers and recruiters identify and avoid unfair hiring practices. An ethical hiring specialist in SEEK Asia leads SEEK's commitment to fair hiring.

In FY2023, some governments in Asia have increased their focus on modern slavery and scam jobs, including in relation to preventing SMS-based employment scams. SEEK brands have been misused to provide legitimacy in these scam communications. As these communications are happening off platform, SEEK is responding to these situations with a focus on creating awareness in the general public.

As part of the Platform Unification program, the ANZ trust and safety approach is being expanded to Asia and will now cover the APAC region. Planning has begun for the implementation of SMS authentication in Asia for hirers to protect accounts from unauthorised access. Artificial intelligence trials are running to improve the effectiveness and efficiency of job ad screening processes.

Due diligence and outcomes

At SEEK, modern slavery employment platform 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 Global 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, and as part of SEEK's ongoing reviews of its employment platforms, JobStreet Singapore and JobsDB Hong Kong were prioritised for due diligence during FY2023.

The implementation of SEEK's Platform Unification program will change and centralise several processes and controls including the automation and enhancement of many screening controls. These controls and processes are continuously monitored and reported to the Fair Hiring Committee (refer page 14).

Summary outcomes

Effectiveness of hirer and ad screening (APAC)

- 7.8 million direct job ads automatically scanned on SEEK platforms across APAC
- Approximately 10% of job ads escalated for manual review (780,000 job ads)

Job ads

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

- 2,879 high-risk job ads removed (of the above 780,000 job ads)

Hirers

Total number of hirers de-activated

- 1,909 hirers did not pass onboarding process assessment
- 350 hirer accounts closed for fraud/scam

Platforms

Modern slavery due diligence of employment platforms

- Assessed JobStreet Singapore and JobsDB Hong Kong businesses

SEEK's employment marketplaces (operations): fair hiring (continued)

JobStreet Singapore

JobStreet operates employment marketplaces in Malaysia, Philippines, Singapore and Indonesia. JobStreet Singapore is the largest employment platform by placement share in Singapore. Jobs are directly posted by hirers and employment agencies predominantly for jobs in Singapore.

Modern slavery risk in Singapore

According to the Walk Free Global Slavery Index 2023, Singapore has a relatively low prevalence of modern slavery. Reports of modern slavery conditions for Singaporean citizens, and Malaysians with Singapore working permits, in local jobs are relatively rare. The modern slavery risks in Singapore relate to the situations outlined below.

- Jobs for inbound foreign workers: Singapore has a high demand for migrant workers to perform low-paid jobs. Migrant workers comprise nearly 40% of Singapore's 3.4 million-strong labour force.
- Jobs overseas for outbound Singaporeans: a relatively small number of people emigrate from Singapore to Malaysia, Indonesia and the Philippines for professional jobs.

Modern slavery due diligence

Modern slavery due diligence during FY2023 for JobStreet Singapore involved the following process:

1. Completion of a sample assessment to guide the evaluation of the size of the inherent risk (based on all job ads that appeared during a representative month in 2023). The assessment focused on lower-paid jobs in the high-risk sectors of cleaning, domestic work and construction, as well as job ads below minimum salary.
2. Assessment of JobStreet's hirer and job ad screening processes.
3. Monitoring mainstream and social media to identify reports about modern slavery related to online recruitment.

Outcomes of the due diligence assessment

The due diligence showed that approximately 25% of job ads are listed by employment agencies. Employment agencies and employment agents must hold the relevant licences and adhere to the Ministry of Manpower's rules. Furthermore, most of the recruitment of foreign workers usually involves employment agents based in the foreign country and/or in Singapore rather than online job posting.

The assessment showed that almost all job ads directly posted on JobStreet Singapore are for low-risk jobs in Singapore (for resident Singaporeans or for Malaysians with a Singaporean work permit). Higher risk job ads for overseas locations outside Singapore accounted for less than 0.01% of the job ads.

Job ads posted directly on JobStreet Singapore are subject to the processes described on page 6.

To protect candidate safety and address modern slavery risks, JobStreet Singapore does the following:

- Conducts due diligence for each direct ad that is for a job located in any of the 14 high-risk countries outside Singapore, including Vietnam, Cambodia, Myanmar and Laos. Only approved job ads from these locations are published on the JobStreet Singapore platform.
- Assesses whether the risks of overseas recruitment can be adequately addressed for high-risk countries.
- Closely monitors emerging trends for scams involving deceptive recruitment in South East Asia.
- Reviews 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.
- Strengthens checks when onboarding recruitment agencies.
- Updates internal standards for response and remediation where human trafficking or modern slavery is identified.



SEEK's employment marketplaces (operations): fair hiring (continued)

JobsDB Hong Kong

JobsDB operates employment marketplaces in Hong Kong and Thailand. JobsDB Hong Kong is the largest employment platform in Hong Kong. Jobs are directly posted by hirers, predominantly for jobs in Hong Kong.

Modern slavery risk in Hong Kong

According to the Walk Free Global Slavery Index 2023, Hong Kong has a relatively low prevalence of modern slavery. Reports of modern slavery conditions for Hong Kong citizens in local jobs are rare. Modern slavery risks relate to the situations outlined below.

- Jobs for inbound foreign workers: Hong Kong has a high demand for migrant workers to perform domestic work and low-paid jobs. Migrant workers comprise approximately 11% of Hong Kong's 3.8 million-strong labour force.
- Jobs overseas for outbound Hong Kong: a very small number of people (less than 1%) emigrate from Hong Kong to China, Macau, Thailand and Singapore for professional jobs.

Modern slavery due diligence

Modern slavery due diligence during FY2023 for JobsDB Hong Kong was performed in three parts, aligned to JobStreet Singapore's due diligence approach described above. High-risk sector jobs analysed focused on cleaning, domestic workers, drivers and security, as well as job ads below minimum salary.

Outcomes of the due diligence assessment

The due diligence showed that JobsDB Hong Kong advertises mainly premium placements, with approximately 70% of the job ads being for professional or highly skilled roles.

The nature of the JobsDB Hong Kong business, and types of jobs advertised, significantly reduce the risk of modern slavery in recruitment. Almost all job ads directly posted on JobsDB Hong Kong are for low-risk jobs in Hong Kong, for Hong Kong residents. Higher risk job ads for overseas locations (mainly China and Macau) accounted for less than 0.1% of the JobsDB Hong Kong job ads.

As Macau is assessed as a high-risk country, from March 2023, due diligence is conducted on each hirer who wants to advertise a job ad located in Macau on the JobsDB Hong Kong platform. For the six months ended 30 September 2023, 25 hirers underwent a due diligence process and were all approved to place Macau location ads on JobsDB Hong Kong.



Modern slavery identified

By way of background, as noted in SEEK's 2022 Statement, in mid-2022 SEEK identified a potential instance of modern slavery. An individual used JobStreet Malaysia to respond to a job ad that appeared legitimate and accepted the job in Cambodia. The hirer was removed from the platform due to its high-risk nature. JobStreet communicated with the individual and warned other jobseekers who accessed the job ad and other job ads in Cambodia.

As a result, in late 2022, SEEK enacted new policies including the blocking of overseas job ads to countries deemed high risk for human trafficking. Those processes have been further improved in FY2023 to allow job ads in some high-risk countries, where enhanced due diligence of the hirer is performed. SEEK continues to review its processes with a focus on due diligence to increase the safety and legitimacy of the platform.

During 2023, SEEK was made aware of:

- Potential circumstances that raised fair hiring concerns through both formal and informal channels. These included incidents of sexual harassment and human trafficking.
- A group of individuals alleged to be involved in human trafficking. It is alleged that the relevant hirer used the JobStreet Malaysia platform to source candidates, who subsequently became victims of human trafficking in Cambodia. SEEK verified that the hirer had been a customer of JobStreet but had not used the platform since mid-2022. Following SEEK becoming aware of the allegations, an internal investigation classified the hirer as high risk from a fair hiring perspective and the account was suspended. SEEK continues to monitor the conclusion of the case for any required actions.

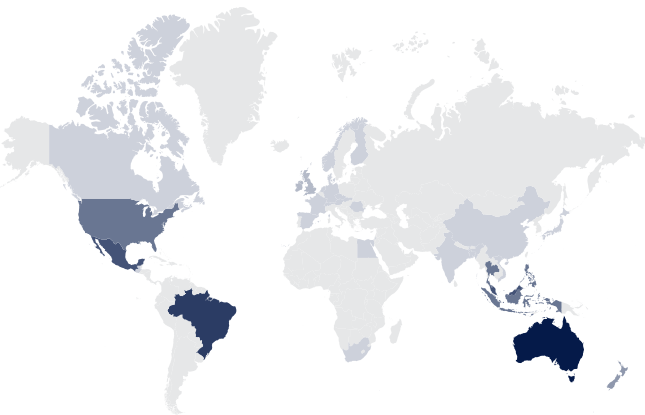
As part of its continuous improvement cycle, SEEK adapts its policies and processes on an ongoing basis to reflect incidents and key incident themes.

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 FY2023, these represented 81% of SEEK's global spend and 57% of its suppliers.

During FY2023, SEEK:

- Commenced modern slavery audits on its cleaning contractors, with four contractors required to improve their policies and processes.
- Updated its Supplier Code of Conduct, strengthening SEEK's requirements relating to labour and human rights.
- Finalised its Modern Slavery Remediation Strategy, formalising the response should an incident, or suspected incident, of modern slavery be discovered in its supply chain.
- Continued to assess suppliers' modern slavery risks, with a particular focus on the recruitment industry.
- Initiated onboarding checks for elevated risk suppliers in Asia, reducing the likelihood of elevated risk suppliers being brought into SEEK's supply chain.
- Strengthened the grievance mechanism to ensure that suppliers and their employees have easier access to SEEK's whistleblower channel.
- Expanded the Strategic Sourcing team, increasing SEEK's capacity to deliver SEEK's supply chain risk framework and assess elevated risk suppliers.
- Delivered modern slavery training across APAC through strategic sourcing roadshows and targeted sessions.



1 Number of direct suppliers 586

Modern slavery risk

Tier 1 suppliers

Suppliers within 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 residual modern slavery risk.

SEEK does engage with some suppliers that have elevated modern slavery risk, due to the industries and locations in which they operate. SEEK has policies and processes in place to better understand and address risks associated with these suppliers. These are outlined on pages 11-12.

Industry risk

SEEK has identified the industries it directly engages with that have high modern slavery risk as cleaning services, recruitment agencies, office equipment and hospitality. SEEK has developed due diligence processes that assess and address the unique risk factors associated with these industries.

Geographical risk

Location is a key consideration when establishing a supplier's inherent modern slavery risk. SEEK's direct suppliers are located

in more than 35 countries with the majority in Australia, Brazil, Mexico and Malaysia. In some of these countries, a lack of government oversight and socioeconomic complexities can result in suppliers operating in ways that create modern slavery risk.

SEEK has identified countries and regions of particular concern and prioritises due diligence of SEEK suppliers operating in these areas. These countries are Bangladesh, China, Egypt, Guatemala, India, Indonesia, Malaysia, Singapore, Thailand and Vietnam.

Global spend by category (FY2023)



- Business services 43%
- Technology – software and support services 19%
- Marketing 19%
- Facilities 7%
- Other 12%

Number of suppliers by category (FY2023)



- Marketing 26%
- Business services 17%
- Technology – software and support services 14%
- Facilities 6%
- Other 37%

Tier 2 suppliers and beyond

SEEK recognises that, even with suppliers considered low risk for modern slavery, risks can exist in the secondary levels of the supply chain. SEEK has primarily focused on the modern slavery risks associated with its direct suppliers. However, during FY2023, SEEK expanded its due diligence to include tier 2 suppliers.

SEEK's strategic suppliers are asked to disclose details regarding their supply chain due diligence. Some are required to share non-sensitive information so that their suppliers can be analysed by SEEK for modern slavery risk.

Industries of particular concern to SEEK are cleaning, construction, hospitality, technology (hardware), furniture and textiles, promotional products, apparel, office supplies and palm oil.

SEEK's supply chains (continued)

Due diligence and outcomes

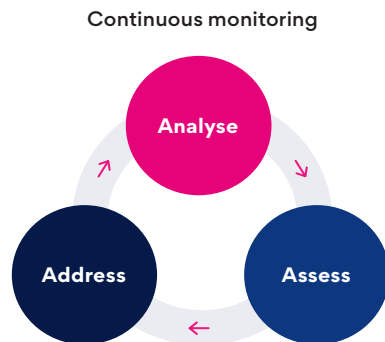
Summary outcomes

Direct suppliers

Suppliers analysed for modern slavery risk	<ul style="list-style-type: none"> 2,112 suppliers analysed (representing 83% of SEEK's suppliers)
Suppliers with elevated risk for modern slavery	<ul style="list-style-type: none"> 580 suppliers found to have elevated risk for modern slavery (representing 23% of SEEK's suppliers)
Number of suppliers assessed or audited through SEEK's supply chain risk framework	<ul style="list-style-type: none"> 155 of SEEK's suppliers assessed, including 55 elevated risk suppliers (representing 7% of SEEK's suppliers and 9% of SEEK's elevated risk suppliers)

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.



Analyse

SEEK partners with a third-party platform 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 FY2023, 83% of SEEK's suppliers were analysed for modern slavery risk.

Assess

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

- suppliers with elevated 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.

These criteria are applied to both existing and potential suppliers.

Suppliers accused of modern slavery incidents and critical suppliers (regardless of their inherent risk) are referred for assessment through a third-party organisation which specialises in modern slavery risk.

Non-critical, elevated-risk suppliers complete a questionnaire, with responses reviewed by SEEK's Strategic Sourcing 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.

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 ensure that these processes are adhered to.

If a supplier is not willing to undergo an assessment or audit, SEEK takes proportionate remedial steps which may include contract termination. During FY2023, one supplier was terminated as it refused to participate in a modern slavery audit.

Assessment of relevant suppliers will continue in FY2024.

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 found to have high residual risk for modern slavery after the completion of 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 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. During FY2023, four suppliers were identified as requiring remediation. All agreed to work towards improving their processes within strict timelines. This meant that, during FY2023, no suppliers were terminated for failing to improve their processes.

SEEK's supply chains (continued)

SEEK's Modern Slavery Remediation Strategy

During FY2023, SEEK finalised its Modern Slavery Remediation Strategy. The strategy formalises SEEK's response to an incident, or suspected incident, of modern slavery occurring within SEEK's supply chain. The strategy is applied to suppliers with high residual risk for modern slavery and aligns with SEEK's Enterprise Risk Framework.

SEEK's response is determined by the likelihood and impact of the risk and includes requiring the supplier to:

- undertake modern slavery training;
- develop a remediation plan; and
- undergo a follow up assessment or audit to determine whether the risks have been mitigated.

In some cases, members of SEEK's Executive Leadership Team, including the Chief Executive Officer (CEO) and Chief Financial Officer (CFO), will be involved in this process. Termination of contract is considered a last resort. SEEK would prefer to work with a supplier to improve its practices, as this results in a more positive impact and a better outcome for the supplier's employees.

Key controls supporting SEEK's supply chain risk framework:

Expertise

- Strategic Sourcing team – includes resources whose roles are dedicated to delivering the supply chain risk framework and implementing appropriate controls.
- Modern Slavery Working Group – a team of individuals from each business (responsible for day-to-day management of modern slavery risk) working collaboratively to implement consistent practices to address modern slavery.
- 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.
- Modern slavery contract clauses – 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 SEEK's supply chain, aligned with SEEK's Enterprise Risk Framework.

Partnerships

- SEEK partners with third-party organisations to perform modern slavery risk analysis and on-site modern slavery audits. Engaging subject matter experts with extensive experience in modern slavery and supply chain risks, provides confidence that the work SEEK does is delivered impartially, effectively and using substantiated information.
- Sustainability network – SEEK is part of a network of professionals from a range of Australian businesses that meets regularly on a range of sustainability topics, including modern slavery.

SEEK's grievance mechanism – ensuring suppliers and their employees access to SEEK's whistleblower channel

SEEK's whistleblower channel provides a safe way for SEEK's employees, suppliers, contractors and other stakeholders to report non-compliance, and illegal or unethical practices without fear of reprisal.

Information relating to the whistleblower channel is provided to suppliers through SEEK's Supplier Code of Conduct. However, SEEK recognised that in some cases, it is unlikely that this information is communicated to supplier's employees, or that small to medium enterprises (which make up a large proportion of SEEK's suppliers) would have their own grievance mechanisms in place.

To address this issue, SEEK took steps to make its whistleblower channel more accessible to its suppliers' employees. This has included displaying posters promoting the channel throughout SEEK's offices (focusing on areas used by cleaners and other on-site contractors). SEEK also added a clause to high-risk contracts requiring the contractor to communicate SEEK's whistleblower channel to all employees.

SEEK will assess whether there is an increase in reports through the whistleblower channels relating to SEEK's suppliers.

SEEK's supply chains (continued)

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

Cleaning services is a high-risk industry for modern slavery with well documented examples of labour exploitation. Withholding of wages, immigration-related coercion and threats and sub-standard working conditions are all modern slavery examples that have been observed in a number of countries in which SEEK operates.

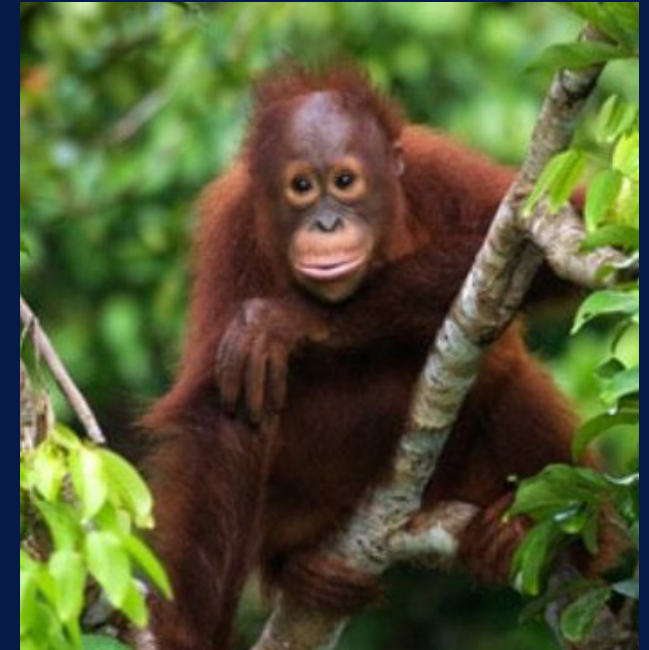
During FY2023, SEEK audited seven of its cleaning contractors for modern slavery risk. The audits were conducted by an independent third-party specialist in modern slavery auditing. The audits consisted of an on-site review of the contractor's governance processes and face-to-face interviews with their employees when required. Findings were anonymised and reported back to SEEK.

One of the cleaning services, contracted to clean a SEEK office, 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 organisations and worked with them to develop a remediation plan that would result in all 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 contractor's employees being negatively impacted.

All four suppliers were receptive to the process and have committed to delivering on their remediation plans. These plans are due for completion during FY2024.

During FY2024, SEEK will audit its remaining cleaning contractors for modern slavery risk.



Transitioning to sustainable palm oil in SEEK's offices

Palm oil is found in many products, from soap to chocolate and cereal. In some regions, palm oil is produced irresponsibly, with forests cleared and local communities displaced to grow plantations. The workforce at these plantations often relies on migrant workers, forced labour and underage workers. Companies using certified sustainable palm oil have committed to ensuring that the workers and communities servicing their palm oil production are treated fairly and respectfully and in line with international and local human rights standards.

In FY2023, SEEK committed to transitioning its Australian office pantry products to items that use sustainably sourced palm oil, helping to drive demand for farming practices that do not rely on modern slavery.

Effectiveness of actions taken

SEEK's employment marketplaces (operations)

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

- 1 **Controls and processes used by SEEK to manage the risks are operating as intended.**
- 2 **Identifying improvements for SEEK to better address risks of deceptive recruitment.**
- 3 **Continuous improvement incorporated into the fair hiring program.**

The fair hiring program is led by SEEK's CEO. SEEK has a Fair Hiring Committee to provide oversight on fair hiring risks and issues across the business.

This Committee oversees the fair hiring governance program of work on policies, tools and processes and also reviews the operational performance of SEEK's controls every three months.

Tracking progress and internal reporting

The Committee receives regular reporting, including quarterly 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.

SEEK's Risk and Assurance team supports the fair hiring program by:

- assessing hirer and job ad screening processes and tracking metrics;
- identifying improvements; and
- recording and tracking agreed actions.

Control environment and processes

Since mid-2022, SEEK has implemented new processes that raise flags, trigger a greater amount of scrutiny, and block various jobs ads to mitigate modern slavery risks. Measures include:

- a more detailed due diligence and investigation process for customers/businesses that request permission to advertise roles in high-risk countries;
- a 'watchlist' based on job ad location, specific terms or industry, medium-risk locations and other specific terms, triggering a manual review of job ads; and
- post Platform Unification, automated screening of all job ads, intended to detect high-risk users and entities using data from worldwide trends and feedback on fraudulent activities.

While these additional controls will not guarantee the detection or prevention of all modern slavery risks, a number of these controls would trigger additional oversight of customers and the prevention of some job ads being posted.

Identification and implementation of improvements

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

JobStreet and JobsDB

- Both JobStreet and JobsDB are targeting accelerated market penetration with a focus on the non-corporate market and small business segments. The businesses have scaled up quality controls and resources to meet increased job ad numbers.
- New hirers are validated at onboarding. Hirer validation includes onboarding checks for scams and fraud.
- Job ad templates and screening are now operating effectively.
- All directly posted ads are subject to automated screening. Manual reviews of ads identified in automated screening has increased to over 90%.
- AI and machine learning are used to enhance fraud detection and prevention capabilities.
- The Trust and Safety team in SEEK Asia has been expanded to support increased focus on fair hiring.
- Further improvements are planned, based on SEEK ANZ product and technology capability, as part of the move to a single platform through Platform Unification.

WorkAbroad Philippines

- Increased transparency of job ads on the platform by reducing the reposting of job ads by agency hirers and reducing time to remove ads that don't meet standards.
- Manual job ad screening across all ads (approximately 5,000 ads per month). On average, just over 100 ads fail quality checks and are de-activated each month.
- Engagement with government to create awareness of job scams targeting aspiring overseas workers.

Effectiveness of actions taken (continued)

Engagement

Stakeholder engagement continues to evolve as the fair hiring program matures. With a focus on SEEK Asia, engagement has so far included:

- information for jobseekers about their rights and how to protect themselves during the recruitment process;
- encouraging hirers to post quality job ads providing transparency for jobseekers;
- education for key teams and interested employees; and
- collaboration with non-government organisations and experts to partner on initiatives and identify priorities.

Employee training and awareness

In FY2023, SEEK commenced an internal communications, engagement and training program to increase employee awareness of modern slavery risks, with a focus on how SEEK strives to improve working lives by preventing exploitative recruitment and modern slavery.

The training program covers key topics associated with fair hiring and modern slavery including SEEK's fair hiring principles, common forms of modern slavery, how crime syndicates are involved with modern slavery, what SEEK is doing to keep its platforms safe and case studies.

Employee training and awareness is an ongoing program throughout FY2024.

Raising awareness with jobseekers

To address risks in the region, SEEK Asia is working to provide jobseekers with clarity and awareness of their rights and warnings about known unfair hiring practices. Some indicators of a scam may include vague or changing job requirements, requesting any form of onboarding or training payment from jobseekers, an advertised salary that is unrealistic and companies with limited or no online presence.

In FY2023, SEEK Asia focused on raising awareness and educating jobseekers. SEEK regularly shared signs of job scams to look out for through social media, email and various media outlets, so that jobseekers can remain vigilant against job scams. The JobStreet and JobsDB sites have new safe job search guides available, including a focus on avoiding deceptive recruitment.



HOW TO PROTECT YOURSELF FROM MESSAGING SCAMS

Let's work together to protect your privacy online.



WHAT TO DO WHEN YOU RECEIVE SCAM MESSAGES?



Do not engage.



Block the sender.



Delete the message.

Effectiveness of actions taken (continued)

SEEK's supply chain

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

- 1 **Delivering SEEK's supply chain risk framework across SEEK's supply chains.**
- 2 **Supporting suppliers with high residual risk to improve their processes.**
- 3 **Continuous improvement of SEEK's due diligence processes.**

The insidious nature of modern slavery, with new areas of risk constantly emerging, makes it challenging to measure SEEK's effectiveness in addressing modern slavery in the supply chain. Despite this challenge, SEEK remains committed to tracking the outcomes of its work, so it can be confident 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.

SEEK uses both qualitative and quantitative metrics to measure effectiveness and progress. The Strategic Sourcing Sustainability Manager is responsible for tracking these metrics and they are reported to the Executive Leadership Team, via various reporting processes, throughout the year (refer to 'Governance' section for further detail).

Delivering SEEK's supply chain risk framework

SEEK measures the effectiveness of its supply chain risk framework based on the metrics set out below.

	FY2022	FY2023
Total number of suppliers	2,616	2,545
Number of suppliers that underwent modern slavery inherent risk analysis	2,397	2,112
Number of suppliers found to have elevated risk following modern slavery inherent risk analysis	649	580
Number of suppliers that have completed a modern slavery risk assessment	80	155
Number of suppliers not meeting SEEK's Supplier Code of Conduct requirements ⁽¹⁾	-	4 ⁽²⁾
Number of modern slavery related incidents identified in SEEK's supply chain	0	0

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. For SEEK, effectiveness is defined as a supplier committing to improve, engaging with SEEK's remediation process and delivering on its commitments.

	FY2022	FY2023
Number of suppliers with high residual risk following assessment or audit	-	4
Number of high-risk suppliers agreeing to undergo remediation	-	4

Continuous improvement of SEEK's supply chain due diligence processes

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

During FY2023, SEEK improved due diligence processes by:

- updating its Supplier Code of Conduct;
- establishing its Modern Slavery Remediation Strategy;
- initiating onboarding checks for elevated risk suppliers in Asia;
- strengthening its grievance mechanism processes; and
- expanding the Strategic Sourcing team.

While more can always be done, each of these pieces of work has helped SEEK be confident that the accuracy, maturity, and effectiveness of processes has substantially improved.

(1) Of the 155 suppliers that have completed a modern slavery risk assessment.

(2) During FY2023 SEEK audited seven of its cleaning contractors to ensure that modern slavery practices were not taking place in their operations. While modern slavery practices were not found, four of the contractors audited were identified as having processes in place that did not meet SEEK's expectations under its Supplier Code of Conduct. SEEK has been working with these suppliers to remediate their practices. Further detail can be found on page 13.

Governance, consultation and collaboration

Governance of SEEK's modern slavery program

SEEK takes a company-wide approach to managing modern slavery risk. The modern slavery program is planned on a three-year rolling basis in consultation with senior management across APAC and in Latin America.

The fair hiring program is described on page 6 and is overseen by SEEK's CEO. SEEK Asia's Chief Executive Officer and other senior leaders are involved in regular meetings as part of this program. An ethical hiring professional is employed by the SEEK Asia business to further improve the program. The Risk and Assurance team oversees the reviews of SEEK's employment platforms.

A Strategic Sourcing Manager is responsible for co-ordinating 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 address these risks, as described on pages 11-13.

SEEK's CFO is accountable for modern slavery reporting, which is the responsibility of the Governance team. SEEK's Audit and Risk Management Committee receives reports on the modern slavery program, and any identified instances of modern slavery on the platforms or in the supply chain if they occur. The Board oversees the process to verify the integrity of this Statement and approves it following endorsement from the CEO and the CFO.

Consultation with SEEK owned and controlled businesses

The modern slavery program of work is managed across APAC. This includes engagement across entities and functions such as Strategic Sourcing, Risk and Assurance, Governance, Finance and operational areas. SEEK collaborates with relevant employees in Mexico and Brazil in relation to supply chain reviews and fair hiring.

The FY2023 reviews of the employment platforms in Singapore and Hong Kong were performed by SEEK's Risk and Assurance team. SEEK's Chief Risk Officer provided oversight of the review of the employment platforms. These due diligence reviews were focused on the inherent risks of modern slavery in the local jobs markets and the residual risks based on the jobs advertised on SEEK's platforms.

Collaboration and engagement

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

Stakeholder collaboration and engagement continues to evolve as the fair hiring program matures. With a focus on South East Asia, engagement has included:

- information for jobseekers about their rights and how to protect themselves during the recruitment process;
- encouraging hirers to post quality job ads providing transparency for jobseekers;
- education for key teams and interested employees; and
- collaboration with non-government organisations and experts to partner on initiatives and identify priorities.

In 2023, SEEK 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 (forum supporting collaboration and policy development relating to irregular migration in the APAC region). At the forum, public and private sectors came together to propose strategies for preventing trafficking into online scam centres.

Grievance mechanisms

SEEK's whistleblower channel is 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.

The Audit and Risk Management Committee receives quarterly updates on any incidents reported through SEEK's whistleblower channels, and is supported by the SEEK Compliance Officer, who oversees the response to whistleblower reports.

On SEEK's platforms, any job ad can be reported to SEEK as suspicious by candidates via the 'Report this job ad' link. All reported job ads are reviewed for compliance and high-risk factors, and appropriate action is taken based on that review.

We continue to build mutually beneficial relationships with our stakeholders



Outlook

Ongoing investment in SEEK's modern slavery program will help to maintain the safe and trusted status of SEEK's employment marketplaces and supply chains. This investment will include third-party independent assessment of effectiveness of processes and quality of disclosure across the modern slavery program of work.

Future program activities will include:

SEEK's employment marketplaces: fair hiring

- Expand the use of AI and machine learning to enhance fraud detection and prevention capabilities.
- Implement further improvements based on SEEK ANZ product and technology capability across Asia as part of the move to a single employment platform through Platform Unification.
- Expand the Trust and Safety team in SEEK Asia to support increased focus on fair hiring.
- Continue internal employee fair hiring training.
- Explore partnership opportunities with third parties including not for profit organisations (with a focus on supporting people migrating across borders).

Supply chain

- Increase supplier capability in relation to managing modern slavery risk.
- Continue to assess and audit SEEK's elevated risk suppliers.
- Expand modern slavery training program for SEEK employees.
- Continue to develop approach and deliver due diligence of tier 2 suppliers.

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 Limited, and its operating subsidiaries owned and controlled entities, for the financial year ended 30 June 2023. 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 15 November 2023

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

Mandatory reporting criteria	Topic heading and location
Identify the reporting entity	About SEEK: page 5
Describe the reporting entity's structure, operations and supply chains	About SEEK: page 2 SEEK's structure and operations: page 5 SEEK's supply chains: page 10
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	SEEK's structure and operations – SEEK's modern slavery risk: page 5 • SEEK's employment marketplaces (operations): fair hiring – Modern slavery risks and controls: page 6 • SEEK's supply chains – Modern slavery risk: page 10
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	SEEK's employment marketplaces (operations): fair hiring – Due diligence and outcomes: page 7-9 SEEK's supply chains – Due diligence and outcomes: page 11-13
Describe how the reporting entity assesses the effectiveness of these actions	Effectiveness of actions taken – SEEK's employment marketplaces (operations): page 14-15 Effectiveness of actions taken – SEEK's supply chain: page 16
Describe the process of consultation with any entities the reporting entity owns or controls	Governance, consultation and collaboration – Consultation with SEEK owned and controlled businesses: page 17
Any other information that the reporting entity considers relevant	Introduction – Progress on addressing modern slavery: page 4 Governance, consultation and collaboration – Governance of SEEK's modern slavery program: page 17



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