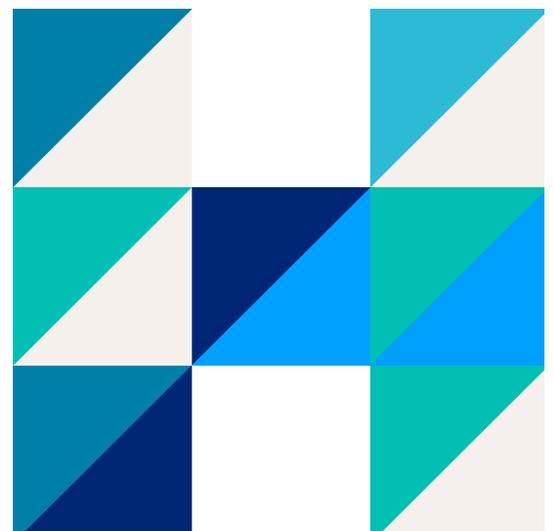


HAYS AUSTRALIA POLICY FOR THE PREVENTION OF & REPORTING ON MODERN SLAVERY

STATEMENT FOR 2021-2022 REPORTING YEAR



Introduction

Hays Specialist Recruitment (Australia) Pty Limited ABN 47 001 407 281, registered office Level 13 Chifley Tower, 2 Chifley Square, Sydney, NSW, 2000 ('Hays'), Australia's leading specialist recruitment and agency worker/labour hire company, recognises that all businesses have an obligation to prevent slavery, slavery-like practices and human trafficking and will do all in its respective power to prevent slavery, slavery-like practices and human trafficking within its business and within the supply chains through which it operates.

This statement addresses Hays' obligations and compliance in relation to the 'Modern Slavery Act 2018 (Cth)' and the 'Modern Slavery Act (2018) (NSW)' (together, 'the Act') and highlights the steps we take to ensure there is no slavery or human trafficking occurring within the organisation or its supply chains. One of our company's most valuable assets has always been its reputation for integrity and fairness. Maintaining this reputation within our market is an essential pre-requisite to our continued success.

Hays acknowledges that it is required to submit its modern slavery statement within 6 months from the end of each reporting period.

Hays' structure & operations

Hays is an Australian large proprietary company that is a wholly owned subsidiary of Hays plc, a UK company listed on the London Stock Exchange. Hays plc is subject to the UK's 'Modern Slavery Act 2015' which covers its subsidiaries, and it produces a statement in relation to the requirements of the UK legislation on behalf of Hays plc and its subsidiary companies and is signed by its Chief Executive and is available on the Hays UK website.

Hays is the leading specialist recruiting company and is an expert at recruiting qualified, professional and skilled people, being the market leader in Australia. Hays operates across the private and public sectors, dealing in permanent positions, contract roles and temporary assignments.

Hays Australia is also the registered branch of Hays' operations in New Zealand, and as at 30 June 2022, Hays Australia employed over 1,000 direct staff operating in 43 offices in each State and Territory of Australia and in New Zealand. For the 2021-22 financial year Hays in Australia placed around 13,500 people into permanent jobs, and also filled over 65,000 temporary jobs, paying an average of 20,000 temporary workers each week.

Our recruitment services can be broadly categorised as follows:

- Permanent recruitment
- Outsourced permanent recruitment
- Executive search and selection
- Temporary recruitment
- Contingent recruitment solutions
- Volume hiring
- Globalink recruitment services
- Sustainability recruitment

We provide our recruitment and job agency/labour hire services in the following areas: Accountancy & Finance; Architecture; Banking; Construction; Contact Centres; Education; Energy; Engineering; Executive; Facilities Management; Healthcare; Human Resources; Insurance; Technology; Life Sciences; Logistics; Manufacturing & Operations; Marketing & Digital; Office Support; Oil & Gas; Policy & Strategy; Procurement; Property; Resources & Mining; Response Management; Retail; Sales and Trades & Labour.

We also provide advisory services in the following areas:

- Assessment and development services
- Salary benchmarking
- Career transition services
- Technology advisory and implementation

Modern slavery can take many forms including the trafficking of people, forced labour, child labour, servitude and slavery. As Australia's leading recruitment experts, we take our responsibility for supplying staff extremely seriously and are aware of the potential for being targeted by traffickers and unlicensed labour hire providers, in local jurisdictions where licensing is a requirement. Our own processes around candidate engagement ensure our employees are alert to the signs of exploitation, so that we may take the necessary action promptly and effectively should it be identified. Sectors affected include, but are not limited to, construction & property, engineering & manufacturing and health & social care.

Hays' supply chains & risks of modern slavery

Recruitment & agency worker/labour hire supply

Our supply chains include sourcing candidates for our clients. This may involve the introduction by external agencies to Hays of candidates for onward supply to our clients, or the direct introduction of candidates to our clients by Hays.

With regard to labour hire specifically, the final report of the Migrant Workers' Taskforce handed down in March 2019 identified four high risk sectors which were horticulture, meat processing, cleaning and security. In addition, Victoria under its labour hire licensing scheme identifies poultry processing as a high-risk sector, and South Australia under its labour hire licensing scheme identifies trolley collection and seafood processing as high-risk sectors.

Hays is licensed as required under the various state and territory licensing schemes. Of the high-risk sectors, Hays only supplies limited workers in the cleaning industry, and limited workers on a sporadic basis in the security industry and meat processing industry in certain states. It does not supply workers into the other high-risk sectors.

Suppliers to Hays

We contract with third parties who provide services to assist with the everyday running of our business, such as IT service providers and property management companies (who, for example, may provide cleaning services to our offices) as well as companies who provide office supplies to our office network.

We acknowledge that by virtue of contracting with other parties, whether as a client or as a supplier, there is always some risk that may contribute to modern slavery practices. We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally compliant and professional manner by adhering to the Hays Supplier Code of Conduct. We also expect our suppliers to promote similar standards in their own supply chain.

Actions taken to assess and address modern slavery risks

Candidate engagement

Hays ensures that strict compliance checks are carried out for all candidates it supplies. We verify the identity of each worker and their right to work before supply commences. We also have a dedicated temporary worker payroll team who audit the relevant modern award or enterprise agreement that a temporary worker is engaged under to ensure they are paid correctly in accordance with the relevant award or agreement.

As part of our commitment to identify and eradicate slavery and human trafficking and to continuously assess and address modern slavery risks, we have in place a process to undertake due diligence on

our supply chain network to ensure compliance with legislative obligations, and such compliance forms part of our contractual relationship with suppliers. We will use best endeavours to procure from our suppliers by contract that full compliance with the Act must be achieved. We will use best endeavours to separately require that any actual or potential risk of breaching the Act that suppliers identify in their own operations or supply chains are communicated to us. This information will be assessed and evaluated appropriately by senior members of Hays management on an ongoing basis.

Supplier Code of Conduct

Hays regularly reviews and updates its Supplier Code of Conduct, which is a document that is relevant to all suppliers to Hays. Suppliers are expected to adhere to the Hays Supplier Code of Conduct, which includes specific reference to various matters including human rights, anti-bribery and corruption, and modern slavery and human trafficking, and suppliers should have in place a policy recognising, respecting and protecting the human rights of their employees, those of their suppliers and business partners and the communities affected by the suppliers' operations.

Hays' position, which is mirrored in its Supplier Code of Conduct, is that:

- Employees should be free to choose to work for their employer and to leave the company upon reasonable notice
- All employees must be provided with a clear contract of employment, which complies with local legislation
- All employees must be treated in a fair and equal manner and with dignity and respect
- Any form of discrimination, victimisation or harassment on any prescribed grounds under commonwealth, state or territory laws should be prohibited. This includes marital status, pregnancy, family responsibilities, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, religious belief, age, trade union activity or any other prescribed ground
- All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to in all countries of operation, without any unauthorised deductions
- All slavery and human trafficking laws must be complied with including, but not limited to, the provisions of the Act and any applicable state legislation. Suppliers must ensure their business operations are free from slavery and human trafficking practices whether in Australia or elsewhere, both internally and within their supply chains and other external business relationships

Cooperation with client due diligence

Our clients in the private sector operate in many industries and range in size from small businesses through to local subsidiaries of global groups. We also work closely with government departments and agencies across all jurisdictions. That being the case, Hays is familiar with participating in clients' audits of their respective supply chains. In doing so, Hays is also able to observe its clients' own practices on the prevention of modern slavery.

Engagement with suppliers

During the reporting period Hays engaged with various companies that provide services to Hays' office network. This involved providing copies of Hays' Supplier Code of Conduct to these suppliers and enquiring as to the modern slavery compliance practices and procedures. Hays has also updated and issued its new RFI documentation to prospective suppliers so that the prevention of modern slavery is specifically addressed as part of Hays' due diligence prior to contracting with a supplier.

Reviewing contractual documentation

Hays' standard form client contract to include specific references to modern slavery law compliance.

Ability for employees to raise concerns at work

All Hays employees have access to dedicated channels through which they may voice concerns, either through local reporting mechanisms or through whistleblowing procedures. Hays is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in compliance with whistleblowing procedures will be treated confidentially and without fear of retaliation.

It is by receiving and evaluating feedback and maintaining a culture of compliance that Hays can assess the effectiveness of its practices and procedures.

Training

All staff within Hays are expected to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty. We have undertaken to review our policies and procedures to ensure our colleagues have access to any additional information and support they may require with regard to human trafficking, forced labour, child labour, servitude and slavery. All relevant employees in Australia will undertake training on modern slavery and human trafficking and this training is available to all employees to undertake.

Assessing the effectiveness of the actions taken

Our assessment of the effectiveness of the tasks set out in our 2020-21 statement is as follows.

Dedicated training on modern slavery laws:

All members of Hays' national client engagement team were required to complete dedicated training on local modern slavery laws led by Hays' internal Legal team with the goal of offering digestible content that did not minimise the seriousness of the subject matter.

The training contained three elements: (1) a summary of Hays' actions taken to achieve compliance with the Laws; (2) a guide as to the content and location of Hays' modern slavery statement; and (3) video content published by the Australian Human Rights Institute specifically chosen for its concentration on the risks presented in industries where Hays has, on occasion, provided workers.

The training was positively received, Feedback from recipients was that this style of training allowed the content to be cascaded through further teams with ease.

Focused audit:

Hays' Legal team again partnered with our Transactions & Facilities Manager to conduct an audit of selected existing suppliers. On this occasion, the focus of our audit was on the suppliers of our office materials.

As in previous years, suppliers were required to confirm their acceptance of and compliance with Hays' Supplier Code of Conduct and selected suppliers were subject to a more rigorous process of completing an audit questionnaire, which required suppliers to evaluate their own maturity in the space, their current practices and how they intend to increase this engagement.

Matters raised included:

- Whether, at this stage, the supplier was aware of the Act and whether they have obligations to comply with reporting requirements
- How the supplier audits its supply chain, if at all
- Descriptions of how its workers' employment was documented, including confirmation that individuals could resign without penalty or restriction
- A commitment by the supplier to increase knowledge of and participation in the prevention of modern slavery in the next reporting year

Suppliers' engagement with and responses to the audit were satisfactory. No modern slavery breaches were disclosed by suppliers or otherwise identified by Hays.

Commitment to continued practices:

In addition to the above, Hays continued to:

- Require potential suppliers to formally disclose their modern slavery risk mitigation strategies as part of Hays' RFI process
- Regularly review our standard form contracts and actioning updates when and if required
- Hold an annual review process with members of senior management

Looking forward

Having completed a number of reports, and having assessed the effectiveness of the steps taken by our business to prevent modern slavery practices occurring at Hays and any prevalence of this within Hays' supply chain, Hays intends on taking the following steps over the next 12 months:

“Working for your tomorrow”

Hays' rebrand and repositioning launched globally on 1 July 2022 in direct response to the changes observed in our industry and how we have been supporting our customers following what have been fundamental changes to the world of work. The new branding, “Working for your tomorrow”, was created to put people, whether clients or candidates, at the core of what we do, and our continued aim is to prepare organisations and people to be better tomorrow than they are today. The Act and its global equivalents are therefore of key consideration.

Significant resources and consultation were applied to develop and agree to the new Hays positioning, involving both internal and external stakeholders to ensure that robust, well-informed decisions could be made. We worked in partnership with an external agency throughout the process to ensure an objective, unbiased and structured approach:

- Detailed research was conducted with a selected group of clients, non-clients (ranging from SMEs to large corporate clients), and candidates globally to understand their perception on what we do well, where we need to improve and most importantly, what they really want and need from us as a partner
- Using this insight, we formed an internal working group, with representatives from all functions and regions, to work together to understand the opportunity for Hays in the future and the changes we would need to make to fully address the needs of our people (that is, our customers, candidates and internal employees) and the broader market

The language used in the new branding is intended to speak directly to our people and indicates how we work collaboratively to enable the goals and ambitions of all parties.

The wording of our new strapline and promise as well as our values has been very carefully crafted to ensure that it captures the essence of our promise to clients, candidates and our own employees alike. One of three values is to ‘Do The Right Thing’.

Our next statement will evaluate how the branding has been received and whether our business practices are consistent with the principles of the new brand.

Changes in the local company group

Changes in Hays' local company group and structure will take effect during the next reporting period. That being the case, Hays will review and evaluate whether these changes will be of any consequence to its current reporting obligations under the Act.

Subject to the outcome of our further investigations and discussions with Hays' management, preliminary views are that even if reporting is not strictly mandatory, Hays is likely to take the view that optional disclosure is consistent with its values and continued commitment to achieving the principles of the Act.

Implementing compliance with the Act

All matters relating to compliance with the Act, including initiatives to achieve continued compliance in subsequent reporting periods, are currently led and managed by Hays' internal Legal team. We recognise that resourcing limitations could be prohibitive to significant development and improvement.

The statement for the 2022-23 reporting period will be Hays' fourth, by which time we intend to have had internal discussions as to whether it is appropriate, and efficient, for the management of Hays' compliance with the Act to be absorbed by a service delivery team in our organisation.

Notwithstanding the above, we recognise that developing more formal frameworks and processes regarding ongoing compliance with the Act is appropriate and intend on exploring this meaningfully in the next reporting periods.

Continued practices

We will continue to regularly undertake, and review the effectiveness, of our now-standard processes regarding compliance with the Act, being to:

- Conduct a targeted audit of Hays' suppliers
- Require potential suppliers to formally disclose their modern slavery risk mitigation strategies as part of Hays' RFI process
- Increase the number of Hays employees who are provided with dedicated training on modern slavery laws
- Regularly review our standard form contracts and actioning updates when and if required
- Hold an annual review process with members of senior management

This statement is made pursuant to the Act and constitutes Hays' slavery and human trafficking statement in respect of the 2021-22 reporting year and is approved by the principal governing body of Hays, being its board of directors.



Signed: Nick Deligiannis
Position: Managing Director, Australia and New Zealand
Hays Specialist Recruitment (Australia) Pty Limited