

Modern slavery statement

ROBERT WALTERS

Introduction

This is our third Modern Slavery Statement (**Statement**) made pursuant to the Modern Slavery Act 2018 (Cth) (the **Act**) and constitutes the modern slavery statement of Robert Walters Pty Ltd ACN 079 521 618 (**Robert Walters**). This Statement covers Robert Walters' operations during the calendar year of 2022 (**Reporting Period**).

Reporting entity overview

Robert Walters is a specialist professional recruitment consultancy. We match highly skilled professionals to permanent, contract and temporary roles across the disciplines of accountancy and finance, banking, engineering, HR, IT, legal, sales, marketing, secretarial and support and supply chain, logistics and procurement.

Robert Walters was established in 1997 with its headquarters and registered office located at Level 23, Queen & Collins Tower, 376-390 Collins Street, Melbourne, Victoria, 3000.

As of 31 December 2022, Robert Walters had a total of 309 internal employees.

Robert Walters is a limited company incorporated in Australia. Robert Walters' parent company and ultimate holding company is Robert Walters plc, a public company limited by shares, incorporated and domiciled in the United Kingdom. Robert Walters controls two other entities: Robert Walters (Australia) Pty Ltd (**Robert Walters (Australia)**) and Resource Solutions Corporation Pty Ltd (**Resource Solutions**).

We have five offices across Australia: Melbourne, Sydney, Adelaide, Brisbane and Perth.

Our supply chains include suppliers from the following sectors: Accommodation, Cleaning, Logistics, Medical Information Technology, Office Supplies and Equipment, Security, Education, Utilities, Property Services, Food and Beverage, Events, Marketing, Travel, Print and Promotional Goods and Services. Most of our suppliers are located in Australia.

The operations and supply chains of Robert Walters' controlled entities are described below:

Entity	Operations	Supply Chain
Resource Solutions	Resource Solutions is a provider of Recruitment Process Outsourcing and Managed Service Provider solutions. As at 31 December 2022, Resource Solutions had a total of 10 internal employees.	Resource Solutions contracts with suppliers in the following industries: <ul style="list-style-type: none"> • Information Technology; • Food and Beverage; • Marketing and Advertising; • Communications; • Labour hire, recruitment and executive search; • Property
Robert Walters (Australia)	Robert Walters (Australia) is a dormant entity controlled by Robert Walters. Robert Walters (Australia) is not carrying out any business activities in Australia.	No suppliers.

Modern slavery statement

ROBERT WALTERS

Potential to cause (directly) – Recruitment and Labour Hire Services

We consider our business to have a low potential to cause modern slavery risks through its service offering. Robert Walters' core business is the supply of labour hire, payrolling and recruitment services in respect of white-collar roles in various industries.

Where labour hire and payrolling services are provided, Robert Walters employs or engages candidates directly who are then on-hired to our clients to perform temporary roles. We provide all candidates with an employment or engagement agreement (as applicable) written in English clearly setting out their terms of employment in accordance with local employment laws. We do not charge candidates fees for the employment or placement services we provide. Nor do we retain indefinitely the original sensitive and personal documents of candidates we employ, engage, or introduce to clients. We also conduct right to work checks where candidates are migrant workers holding temporary working rights in Australia to ensure the person is a lawful resident of Australia and has valid working rights. Our own recruitment consultants are trained to contact candidates regularly as a form of 'check-ins', as a basis for candidates to be open and communicate any concerns about their placements to our consultants, who are well-equipped to raise any matters to their managers.

Robert Walters is firmly committed to complying with all applicable laws in its provision of services and is governed by many industry specific authorities and bodies.

For example, each state, where applicable, is governed by labour licencing authorities to ensure labour hire companies are complying with their licencing requirements and laws. The objective of these labour hire licencing schemes are primarily to protect workers from exploitation by labour hire providers and their clients, to improve the transparency and integrity of the labour hire industry, and to promote responsible practices in the industry. These licencing requirements establish a framework for accountability within the labour hire industry and enable the licencing authorities to monitor and enforce compliance, ensuring that providers meet their legal and ethical obligations towards workers. A requirement of these licences is that Robert Walters' officers and nominated officers on the licence pass the 'fit & proper person' tests and to also submit biannual reports to each licencing authority. These reports require us to declare, amongst other things, the number of candidates on our payroll, the class of visas held by any of these candidates, confirmation that we do not charge candidates for services, WHS incidents and details of any breaches of the Fair Work Act 2009 (Cth).

In addition to the above, Robert Walters is a corporate member of the Recruitment, Consulting and Staffing Association (**RCSA**) and the Association of Professional Staffing Companies (**APSCo**). As a corporate member of these two industry associations, we are bound by their Code of Conduct, which makes us accountable for meeting certain standards of professional conduct, including the requirements to protect candidates from exploitation (including forms of modern slavery); conduct business in a way that avoids causing or contributing to exploitation through their activities; and seek to prevent or mitigate risks of exploitation that are linked to their operations or services by their business relationships, even if they have not contributed to those risks. RCSA and APSCo corporate members are responsible for ensuring that their staff meet the standard of professional conduct required by each Association's Code of Conduct.

Potential to contribute (indirectly)

We understand that recruitment agencies in general may potentially contribute to modern slavery practices by supplying and introducing candidates to companies operating in high-risk sectors or countries.

The Modern Slavery Risks, Rights & Responsibilities report,¹ commissioned by the Australian Council of Superannuation Investors and prepared by KPMG, identified six high-risk sectors: financial services, property, food and beverage, agriculture, mining, and health care. State labour hire licencing schemes also consider the following industries to represent a higher risk: trolley work, horticulture, meat processing and seafood processing, fishing, and cleaning.

Of the high-risk sectors identified, those which Robert Walters provides services to are the financial services, property, and health care industries in Australia. In all cases, Robert Walters only supplies services in respect of white collar professional roles.

To mitigate any risks of underpayment to, or exploitation of, our labour hire workforce, we provide extensive training to our recruitment consultants on workplace laws and regulations. In addition, our internal finance and payroll systems are designed in a way that prevent the recording of candidate placements with a pay rate that is below the applicable minimum wage rate or the rate prescribed by the relevant modern award. These measures allow Robert Walters to educate and alert its clients about potential underpayments of candidates they are looking to engage for temporary roles.

Be linked to (via supply chains)

We understand that by virtue of procuring goods or services from third parties, we may be unintentionally linked to modern slavery. As such, we are committed to engaging with trusted suppliers.

Our supply chain includes suppliers from the following sectors: Accommodation, Cleaning, Logistics, Medical Information Technology, Office Supplies and Equipment, Security, Education, Utilities, Property Services, Food and Beverage, Events, Marketing, Travel, Print and Promotional Goods and Services. The majority of our first-tier suppliers are based in Australia. We also have global agreements with large suppliers in the UK, USA and Singapore which are all closely monitored.

¹ KPMG, Modern Slavery Risks, Rights & Responsibilities (Report, February 2019) <
<https://assets.kpmg/content/dam/kpmg/au/pdf/2019/modern-slavery-guide-for-companies-investors-feb-2019.pdf>>.

Modern slavery statement

ROBERT WALTERS

Actions taken by Robert Walters

Since publishing our first Modern Slavery Statement, we have strengthened our key policies and procedures and have implemented additional measures to assess and address modern slavery risks in our operations and supply chain.

Modern Slavery Policy

In October 2020, we published a Modern Slavery Policy on our website. It requires all our Suppliers to comply with our policy when supplying goods and services to us. Robert Walters has a zero-tolerance approach to any imposition of, or connection with, modern slavery and human trafficking. The policy reflects our commitment to acting ethically and with integrity in respect of our staff, business relationships and the community in general. Supplier engagement is also emphasised in the policy by way of promoting ethical practices and mitigating modern slavery risks. The policy can be found on our website or via the following link:

<https://www.robertwalters.com.au/about-us/modern-slavery-statement-policy.html>

Whistleblowing

Robert Walters has a Whistleblower Policy in place that allows eligible disclosers to report on a matter where there are reasonable grounds to suspect misconduct or an improper state of affairs in relation to Robert Walters, its employees, officers or any related body corporate. Disclosures may relate to violations of modern slavery laws. Eligible disclosers can make a disclosure in person, by phone or post, or anonymously. The Whistleblower Policy can be found via the following link:

<https://www.robertwalters.com.au/about-us/robert-walters-whistleblower-policy.html>

Supplier Code of Conduct

Our Supplier Code of Conduct was published in January 2021 and sets a minimum standard for all our Suppliers. Our expectation is that our suppliers implement adequate measures to comply with legal, ethical, social and environmental requirements and best practices in Australia and internationally, where applicable. Our Supplier Code of Conduct can be found via the following link:

<https://www.robertwalters.com.au/about-us/supplier-code-of-conduct.html>

Ethical Conduct Policy

We also have a global Ethical Conduct Policy to assist in managing the risks associated with modern slavery. This policy serves as a guide for all our employees to understand Robert Walters' expectation in relation to ethical behaviour and establishes a foundation for professional and responsible practices from within.

<https://www.robertwaltersgroup.com/about-us/policies.html>

Social Accountability and Human Rights Policy Statement

Our global Social Accountability and Human Rights Policy Statement outlines our commitment to social responsibility and affirms our commitment to uphold human rights of all individuals. The policy emphasises the promotion of fair and ethical employment practices including prohibition of forced labour.

<https://www.robertwaltersgroup.com/about-us/policies.html>

Contractual Obligations

During the Reporting Period, we reviewed our previously prepared modern slavery clause for inclusion in our Supplier contracts and revised it with the view of continuous improvement. The clause requires our suppliers to take steps to mitigate modern slavery risks within their supply chains and notify us where a modern slavery risk is identified within their supply chain. The clause also requires suppliers to represent and warrant that they are not aware of any modern slavery in their own operations, subcontractors, or suppliers' operations. We believe this contractual obligation is essential to mitigate risk in not only our Tier 1 Suppliers, but through to our Tier 2 Suppliers and beyond.

Modern Slavery Questionnaire

Robert Walters continues to send out our Modern Slavery Questionnaire on an annual basis to all suppliers, which is issued to all of our Tier 1 Suppliers. We have internal systems which keep track of our suppliers and internal transactions. This list was then expanded to include contact details and important information about each of our Suppliers so that we could easily issue our questionnaire to the relevant contacts at each Supplier.

The aim of the questionnaire is to gather information on how our suppliers are managing modern slavery risks within their own supply chains, to ensure they are taking appropriate measures and to potentially identify Tier 2 suppliers.

Modern slavery statement

ROBERT WALTERS

Self-Assessment Questionnaire

We have also launched our onboarding questionnaire to new suppliers requiring them to provide information related to their operations and supply chains. New supplier responses are conditional on Robert Walters accepting them as suppliers.

Internal Audits

Robert Walters maintains high principles in respect of human rights in its internal and external operations. Each year Robert Walters' internal HR and Payroll teams conduct salary and wage audits to ensure that each employee receives at least the minimum wage, applicable penalty rates and superannuation as required by law.

Robert Walters' internal systems (including our payroll systems) are designed to prevent underpayment of its candidates and permanent staff.

Candidate Care

Robert Walters' recruitment consultants are committed to maintaining exceptional candidate care. We maintain close contact with all candidates upon placement in temporary and permanent roles and have regular catch ups with such candidates to identify any unfair or unjust treatment of candidates by clients. Some of our offices also have a dedicated candidate management team to ensure regular contact with candidates, even those in long tenure roles.

Our consultants and candidate management team receive extensive training on the type of questions to ask a candidate about their new role, volume of work, working hours and how the job meets the candidate's expectations to easily identify signs of poor health, work conditions or mistreatment.

Assessing the effectiveness of our actions

Number of Complaints

Robert Walters provides avenues for candidates and permanent staff to raise concerns about payments and working conditions. During the Reporting Period, Robert Walters did not receive any complaints from candidates or staff in relation to matters that could result in or contribute to the risks of modern slavery.

Regular Reviews of Internal Processes

Our business departments are constantly considering how they can improve Robert Walters' operations. We conduct regular reviews of our internal processes, databases and our policies that we share with staff and external stakeholders.

Internal Audits and Reviews

Our internal Payroll team conducts monthly reviews of processed payments to identify if candidates who are paid a fixed hourly rate are better off overall when compared to being paid in accordance with a modern award. During the Reporting Period, Robert Walters' Payroll Manager identified two instances where an on-hired candidate was underpaid because each candidate worked unscheduled overtime hours over a one-month period. In both instances, the candidate was back paid the correct amount as soon as the underpayment was identified and their salary was amended to meet the applicable award rates.

Modern Slavery Questionnaire Responses

Our modern slavery responses are an easy way to identify any risks within our supply chain and identify which are high risk suppliers. The responses to the questionnaire have not presented any obvious risks or issues within our supply chain. These questionnaires will be sent out on an annual basis and the Self-Assessment Questionnaire will be sent to new suppliers.

Modern slavery statement

ROBERT WALTERS

Our goals

Robert Walters will continue focusing on improving its anti-modern slavery practices. Our goal for 2023 is to roll out extensive training for all employees, including on a global level and further develop our modern slavery due diligence processes. Robert Walters is committed to continually improving its initiatives in identifying and mitigating modern slavery risks in its operations and supply chains.

The mandatory training on modern slavery for all employees will be implemented this year upon the launch of our new online training platform. The training will cover:

- understanding modern slavery and its various forms such as forced labour, exploitation and human trafficking;
- the relevant legal framework;
- recognising red flags relating to recruitment practices (working conditions, payment, restrictions on freedom of movement);
- roles and responsibilities of all employees;
- supplier screening and asking the right questions; and
- mitigation strategies.

Training will be ongoing and will form a crucial part of Robert Walters' mitigation against modern slavery practices.

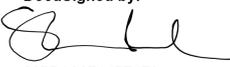
Robert Walters intends on creating a formal response mechanism following identification of modern slavery practices to cover reporting to the appropriate internal channels, seeking guidance from advisors/legal departments, involving relevant stakeholders, investigating, mitigating and subsequently evaluating policies and procedures.

Robert Walters has established certain risk management goals it plans to achieve in the future. We have divided risk management goals into two categories: short-term goals and long-term goals.

Short-term goals are actions Robert Walters aims to undertake in the next reporting period. Long term goals describe actions Robert Walters intends to undertake within the next five (5) years to manage and mitigate risks of modern slavery.

Short term goals	Long term goals
<p>Internal training</p> <p>Robert Walters will implement training on how to identify modern slavery risks for staff who select and engage with suppliers. This training will become compulsory will be run as part of our New-Starter Training Program.</p> <p>Formal Response Mechanism</p> <p>Robert Walters will implement a formal response mechanism following the identification of modern slavery. The mechanism will then be communicated to all employees at Robert Walters to follow.</p>	<p>Second-tier supplier assessment</p> <p>Robert Walters will require its first-tier suppliers to report on their suppliers and operations within suppliers' supply chains.</p> <p>Supplier mapping</p> <p>Robert Walters aims to prepare a map of its supply chain which extend to second and third tier suppliers.</p>

This statement was approved by the board of Robert Walters Pty Ltd on 22 February 2023.

DocuSigned by:

 807DA307415E470...
Shay Peters
 CEO - ANZ
 Robert Walters Pty Ltd