



Be Recruitment Group | Modern Slavery Statement

HR Policy 25	Authorised By: Director	
Issue Date: August 2019	Review Date: July 2026	Version Number: V6

Statement of Intent

Be Recruitment Group is committed to upholding ethical sourcing practices and eliminating all forms of modern slavery and exploitation from its operations and supply chain. This statement is made pursuant to the Modern Slavery Act 2018 (Cth) and sets out the actions we take to identify, prevent, and address modern slavery risks, including specific considerations when engaging offshore recruitment and resourcing providers.

1. Scope

This statement applies to:

- All employees and contractors of Be Recruitment Group.
- All suppliers and third-party service providers, including those engaging offshore workers on our behalf.

2. Compliance and Ethical Standards

This statement is made with regard to the Modern Slavery Act 2018 (Cth) and Modern Slavery Act 2018 (NSW). Be Recruitment Group adheres to the RCSA Code for Professional Conduct, which requires members to:

- Protect workers from exploitation (including modern slavery).
- Avoid contributing to exploitation through their business activities.
- Seek to prevent or mitigate exploitation risks in their business relationships.

We also comply with the Fair Work Act 2009 (Cth), the Australian Consumer Law, and relevant international conventions, including ILO standards on child labour and forced labour. Be Recruitment supports the enforcement of these protections and aligns all operations with their intent and obligations.



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3. Risk Identification and Supplier Controls

3.1 Risk Assessment

We conduct regular risk assessments across our supplier network and maintain a Supplier Modern Slavery Risk Tracker to document risk categories, contract status, known policy compliance, and review dates. This tracker is reviewed quarterly as part of our Quality Management System (QMS).

3.2 Supplier Questionnaire – HRPRO13

All suppliers must complete Be Recruitment's Modern Slavery Supplier Questionnaire (HRPRO13), issued electronically via email or an automated system, which assesses compliance with the Modern Slavery Act and gathers information on:

- Contract language and employment terms with workforce
- Wage and entitlement structures
- Age verification processes
- Worker grievance mechanisms

4. Offshore Recruitment and Resourcing

For any service provider engaging offshore staff on our behalf, Be Recruitment Group requires:

- Full transparency around the use of offshore labour and the countries involved
- Employment contracts provided in the worker's native language
- Clear documentation of entitlements, notice periods, and rights
- No unlawful deductions, bond-like arrangements, or recruitment fees
- Verification of worker age in line with ILO minimum age standards
- Freedom of association and the right to resign without penalty

Be Recruitment Group will not tolerate the use of child labour in any circumstances and reserves the right to investigate and terminate agreements where non-compliance is suspected or confirmed.



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5. Supplier Due Diligence and Monitoring

Offshore and high-risk suppliers must:

- Complete the Modern Slavery Supplier Questionnaire annually
- Cooperate with random or scheduled audits
- Nominate a compliance contact who will be captured in our CRM to support active monitoring

Be Recruitment Group maintains a register of all suppliers and their risk rating, modern slavery documentation status, and attestation history.

6. Training and Reporting

All internal, permanent, and casual staff are required to complete modern slavery and vulnerable worker training through WorkPro modules. Employees and contractors are encouraged to report any suspected modern slavery or exploitation through their manager or directly to the Director. Reports are managed under Be Recruitment's Whistleblower and Child Safety Policies, with protections in place for those raising concerns in good faith.

7. Monitoring and Review

This statement will be reviewed annually or earlier if required due to legislative updates or supplier-related incidents. The Supplier Risk Tracker will be updated regularly and discussed as part of Be Recruitment's quarterly supplier reviews and QMS compliance check-ins.

8. Assessing Effectiveness

Be Recruitment Group evaluates the effectiveness of our actions to combat modern slavery through:

- Quarterly review of the Supplier Modern Slavery Risk Tracker to ensure risks are being identified and mitigated.
- Annual audits of high-risk and offshore suppliers, with follow-up corrective actions documented and tracked.



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- Monitoring completion rates of staff training modules and conducting refresher training where gaps are identified.
- Reviewing supplier questionnaire responses against independent benchmarks and industry standards.
- Analysing reports or concerns raised under our Whistleblower and Child Safety policies, including outcomes and remedial action taken.
- Reporting outcomes to the Board annually to ensure oversight and continuous improvement.

9. Consultation with Controlled Entities

- Be Recruitment Group consults with any entities we own or control through:
- Sharing policies, procedures, and training modules across all group entities to ensure a consistent approach to managing modern slavery risks.
- Engaging operational leaders in each entity in the completion and review of supplier questionnaires and risk assessments.
- Regular cross-entity governance meetings where modern slavery risks and compliance activities are discussed.
- Consolidated reporting to the Board of Directors to ensure whole-of-group accountability.

10. Policies and Actions

Be Recruitment has implemented:

- Fair employment practices: staff are hired voluntarily, paid market-aligned salaries aligned with Awards, and entitled to leave and benefits under Australian law.
- Verification of identity and age of all staff to eliminate child or forced labour.
- Training for HR and operational leads on legal and ethical recruitment practices; all staff complete Modern Slavery training at induction.
- Zero tolerance policies on forced or coerced labour.
- DAs and legal agreements with staff and partners, reinforcing anti-slavery clauses.
 - Supplier checks to confirm adherence to ethical standards, especially when services extend across multiple jurisdictions.



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11. Forms and Tools Referenced

- HRP013 – Supplier Questionnaire
- Supplier Modern Slavery Risk Tracker
- WorkPro – Staff Induction Modules
- CRM/JobAdder – Supplier Contact Register

12. Contact and Reporting Concerns

For reports regarding modern slavery, contact: Jenny Rosser – Managing Director Email: Jenny@berecruitment.com.au

13. Approval & Signature

This Modern Slavery Statement has been approved by the Board of Directors of Be Recruitment Group in its capacity as the principal governing body of the reporting entity.

Signed,

Jenny Rosser

Jenny Rosser

Managing Director & Responsible Member

Date: September 2025

Signed,

Zena Clark

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Managing Director & Responsible Member

Date: September 2025