

Modern Slavery Statement 2026

1. INTRODUCTION

This is our sixth Modern Slavery Statement ("**Statement**"), prepared in accordance with the Modern Slavery Act 2018 (Cth) (the "**Act**"). It outlines the actions taken by Robert Walters Pty Ltd ACN 079 521 618 ("**Robert Walters**") to identify, assess and address modern slavery risks within its operations and supply chains. This Statement relates to the activities of Robert Walters for the calendar year 2025 (the "**Reporting Period**").

In preparing this Statement, Robert Walters strives to continue to strengthen its governance, risk management processes and organisational capability relating to modern slavery. This Statement has been reviewed and approved in accordance with the governance requirements set out in the Act, demonstrating Robert Walters ongoing commitment to ethical and responsible business practices.

2. REPORTING ENTITY OVERVIEW

Business Overview

Robert Walters is a specialist professional recruitment consultancy and advisory business. We connect highly skilled professionals with permanent, contract and temporary roles across a wide range of disciplines, including accountancy and finance, banking, engineering, human resources, information technology, legal, sales, marketing, secretarial and business support, as well as supply chain, logistics and procurement. We also provide workforce analysis and advice to our clients including market intelligence, workforce retention strategies and professional coaching.

Through the nature of our recruitment and workforce solutions and advisory services, our operations involve engagement with diverse candidate pools, clients and suppliers, each of which forms part of the broader value chain in which modern slavery risks may arise.

Corporate Structure

Robert Walters was established in 1997 and has its headquarters and registered office located at Level 23, Queen & Collins Tower, 376–390 Collins Street, Melbourne, Victoria 3000. Robert Walters is a limited company incorporated in Australia and forms part of the global Robert Walters Group. Its parent 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 within Australia:

- Robert Walters (Australia) Pty Ltd, and
- Resource Solutions Corporation Pty Ltd, (trading as "Robert Walters").

Together, these entities form the structure through which Robert Walters delivers its recruitment and workforce solutions and advisory services in Australia.

As of 31 December 2025, Robert Walters had a total of 169 internal staff, and 1291 temporary staff.

Office Locations

Robert Walters operates five offices across Australia, located in Melbourne, Sydney, Adelaide, Brisbane and Perth. These offices support the delivery of our recruitment and workforce solutions and advisory services and form part of the operational footprint considered in this Statement.

Supply Chain Overview

Robert Walters engages a broad range of suppliers to support its business operations. Our supply chain includes goods and services providers across sectors such as accommodation, cleaning, logistics, information technology, office supplies and equipment, security, education and training, utilities, property services, food and beverage, events, marketing, travel, and print and promotional goods and services.

The majority of our suppliers are located in Australia, with some international providers engaged for specialist or global service requirements. These supplier relationships form part of the broader supply chain context examined in this Statement.

3. CONTROLLED ENTITIES

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

ENTITY	OPERATIONS	SUPPLY CHAIN
Resource Solutions Corporation Pty Ltd	Resource Solutions Corporation Pty Ltd (trading as Robert Walters) provides Recruitment Process Outsourcing (RPO) and Managed Service Provider (MSP) solutions to clients. As of 31 December 2025, Resource Solutions had a total of 10 internal employees. Its service delivery model involves close engagement with clients, candidates and third-party service providers, which forms part of the operational context considered in this Statement.	Resource Solutions Corporation Pty Ltd (trading as Robert Walters) engages suppliers across the following industries: • Information Technology; • Marketing and Advertising; • Communications; • Labour hire, recruitment and executive search; These categories reflect the goods and services used to support its RPO and MSP service delivery.
Robert Walters (Australia) Pty Ltd	Robert Walters (Australia) Pty Ltd is a dormant entity controlled by Robert Walters. It does not conduct business activities in Australia.	No suppliers.

Consultation with Controlled Entities

In preparation of this Modern Slavery Statement, we actively engaged and consulted with our reporting entity, Resource Solutions Corporation Pty Ltd (trading as Robert Walters) by referencing our obligations under the Act, providing them with details on our actions against modern slavery risks, and understanding their own actions against modern slavery risks. We are satisfied that both entities are taking continuous action against modern slavery risks.

4. MODERN SLAVERY RISKS

Potential to Cause Modern Slavery (Direct Risk) – Recruitment and Labour Hire Services

We consider our business to have a low potential to directly cause modern slavery through its service offering. Robert Walters' core business is the supply of labour hire, payrolling and recruitment services for white-collar roles across a range of industries. The nature of these roles and the regulatory environment in Australia contribute to a lower inherent risk profile.

Where labour hire and payrolling services are provided, Robert Walters employs or engages candidates directly, who are then on-hired to clients to perform temporary roles. All candidates receive an employment or engagement agreement (as applicable), written in English and clearly setting out their terms and conditions in accordance with Australian workplace laws.

In line with licensing and other regulatory requirements, we do not charge candidates any fees for the employment, recruitment or placement services we provide. We also do not retain, on an indefinite basis, original sensitive or personal documents belonging to candidates we employ, engage or introduce to clients. Right-to-work checks are conducted on all candidates, including migrant workers with temporary working rights in Australia, to confirm lawful residency and valid working rights in Australia.

We have a dedicated Contracts & Compliance team responsible for ensuring that all recruitment practices meet legal and ethical standards. This includes clear communication with candidates, maintaining proper documentation, conducting right-to-work verification, and actively working to prevent any association with modern slavery or exploitative labour practices.

Candidate queries are addressed promptly and directed to the appropriate internal teams, such as the Legal team, Human Resources team or Payroll team, depending on the nature of the inquiry. Our recruitment consultants complete regular "check-ins" with candidates to provide opportunities for them to raise concerns about their placements. Any issues identified are escalated to management for review and action. Worksites of any Candidates placed in temporary roles

Robert Walters also provides all temporary workers with access to an Employee Assistance Program ("EAP"), offering free and confidential counselling services to support worker wellbeing.

Regulatory Compliance

Robert Walters is firmly committed to complying with all applicable laws in its provision of services and is governed by various authorities and regulatory bodies relevant to the recruitment and labour hire industry. In each state and territory where applicable, labour hire licensing authorities oversee the conduct of labour hire providers to ensure compliance with licensing requirements and relevant laws. The primary objectives of these labour hire licensing schemes are to protect workers from exploitation by labour hire providers and host clients, improve transparency and integrity within the industry, and promote responsible and ethical labour hire practices.

These licensing frameworks create clear standards of accountability across the labour hire sector and empower regulators to monitor and enforce compliance. This includes verifying that labour hire providers meet their legal and ethical obligations towards workers, including those related to employment rights, safety, and workplace protections.

A key requirement of these licences is that Robert Walters' officers and nominated officers satisfy the "fit and proper person" criteria and submit biannual reports to each relevant licensing authority.

These reports require us to declare, among other matters:

- the number of candidates on our payroll;
- the visa classes of any candidates employed or engaged;
- confirmation that we do not charge candidates for services;
- confirmation of compliance with the National Employment Standards;
- workplace health and safety incidents;
- details of any breaches of the *Fair Work Act 2009* (Cth).

Additionally, recruitment agencies providing permanent recruitment services in Western Australia and South Australia are required to hold an employment agent's licence. This ensures that providers act legally and ethically in their provision of permanent recruitment services to clients and candidates. Robert Walters holds an employment agent's licence in both Western Australia and South Australia.

This regulatory oversight reinforces our ongoing commitment to ethical recruitment practices and supports our broader approach to identifying and addressing modern slavery risks across our operations.

Industry Association Requirements

In addition to the regulatory requirements outlined above, Robert Walters is a corporate member of the Recruitment, Consulting and Staffing Association ("**RCSA**"). As a corporate member of this industry association, we are bound by the RCSA Code of Conduct, which sets clear expectations of professional and ethical behaviour across the recruitment and staffing sector.

The RCSA Code of Conduct requires corporate members to uphold standards designed to protect candidates from exploitation, including all forms of modern slavery. Members must conduct their business in a manner that does not cause or contribute to exploitation and must take steps to

prevent or mitigate risks of exploitation that may be directly linked to their operations, services or business relationships, even where they have not contributed to those risks.

RCSA corporate members are also responsible for ensuring that their own staff meet the standards of professional conduct set out in the Code. This includes ensuring that staff act ethically, communicate transparently, follow responsible recruitment practices, and take appropriate action where potential risks or concerns are identified.

Client-Specific Requirements

Several of our client contracts contain explicit requirements for Robert Walters to take proactive measures in preventing modern slavery. These contractual obligations form part of our broader compliance framework and reinforce our commitment to maintaining the highest ethical standards across our operations.

These requirements typically include obligations to assess and monitor our supply chains, maintain appropriate policies and procedures, and take reasonable steps to prevent any form of forced labour, human trafficking or exploitative practices occurring within the services we provide.

By meeting these obligations, we demonstrate our commitment to respecting human rights, promoting responsible business conduct, and providing clients with transparent and accountable service delivery.

Potential to Contribute (Indirectly)

We recognise that recruitment agencies may potentially contribute to modern slavery risks indirectly by supplying or introducing candidates to companies operating in higher-risk sectors or countries. This risk exists even where the agency does not cause the harm directly but may contribute to it through its business relationships or service delivery model.

The Modern Slavery Risks, Rights & Responsibilities report, commissioned by the Australian Council of Superannuation Investors and prepared by KPMG, identifies six high-risk sectors: financial services, property, food and beverage, agriculture, mining, and health care. In addition, state labour hire licensing schemes classify the following industries as higher risk: trolley work, horticulture, meat processing and seafood processing, fishing, and cleaning.

Of the high-risk sectors identified, Robert Walters provides services to the financial services, property and health care industries in Australia. In all such cases, Robert Walters only supplies recruitment, labour hire and advisory services relating to white-collar professional roles.

To mitigate risks of underpayment or exploitation within our labour hire workforce, we provide extensive training to our recruitment consultants on Australian workplace laws and regulatory requirements. Our dedicated Learning and Development team designs and delivers training programs that enhance capability, support professional development, and ensure staff are equipped to uphold ethical and inclusive recruitment practices.

All Robert Walters staff complete mandatory modern slavery training via our learning management system. The system tracks completion, issues reminders, and ensures regular refresher training occurs. Training records are monitored to ensure compliance.

Our internal finance and payroll systems include controls that prevent the recording of any placement with a pay rate below the applicable minimum wage or modern award rate. These controls assist in identifying potential underpayments and allow Robert Walters to alert clients where a proposed temporary engagement may pose a compliance risk.

Robert Walters is certified to ISO 9001:2015 (Quality), ensuring consistent service standards. Implementation of this globally recognised management system requires the organisation to consider its operating environment and the needs and expectations of workers, including risks associated with forced labour and modern slavery.

Robert Walters is also certified to ISO 45001:2018 (Safety). This accreditation reflects our responsibility for how our systems affect all workers and reinforces the importance of managing reputational and regulatory risks associated with modern slavery. Holding this certification supports our due diligence processes and helps ensure appropriate controls are in place to identify and address modern slavery risks within our operations and supply chains.

Be Linked To (Via Supply Chains)

We recognise that by procuring goods and services from third-party suppliers, Robert Walters may be inadvertently linked to modern slavery risks within those suppliers' operations or their own supply chains. As such, we are committed to engaging trusted suppliers and undertaking appropriate due diligence to reduce the potential for these relationships to expose our business or workers to harm.

Our supply chain includes suppliers across sectors such as accommodation, cleaning, logistics, information technology, background checks, office supplies and equipment, security, education, utilities, property services, food and beverage, events, marketing, travel, and print and promotional goods and services. The majority of our first-tier suppliers are based in Australia.

We also maintain global agreements with several large suppliers located in the United Kingdom, the United States and Singapore, which are monitored closely as part of our risk management processes.

5. Actions Taken by Robert Walters

Since publishing our first Modern Slavery Statement, we have continued to strengthen our key policies and procedures and have implemented additional measures to assess and address modern slavery risks within our operations and supply chain. These activities form part of our ongoing commitment to continuous improvement and responsible business conduct.

Modern Slavery Policy

In October 2020, Robert Walters published its Modern Slavery Policy. The policy was most recently updated in April 2025. The policy requires all suppliers to comply with its standards when supplying goods and services to us. Robert Walters has a zero-tolerance approach to any form of modern slavery or human trafficking. The policy reflects our ongoing commitment to acting ethically and with integrity in respect of our staff, our business relationships, and the broader community.

The policy emphasises supplier engagement, including the promotion of ethical practices and the mitigation of modern slavery risks within our supply chain.

The policy can be accessed [here](#).

Whistleblowing

In early 2024, the Robert Walters Group rolled out a global Whistleblower Policy (external whistleblowing policy), incorporating country-specific provisions for Australia where applicable. This policy was most recently updated in August 2025. The development of this policy involved extensive consultation across all regions to ensure it reflected a consistent global framework while also meeting local legislative requirements.

The purpose of the policy is to provide a clear, accessible mechanism for third parties to raise genuine concerns about wrongdoing connected with Robert Walters. The Whistleblower Policy allows eligible disclosers to report matters 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 include concerns relating to modern slavery or breaches of modern slavery laws. Eligible disclosers may make a report in person, by phone, in writing, or anonymously via a third-party portal.

At the same time, the Robert Walters Group introduced its global Raising a Serious Concern at Work policy (internal whistleblowing policy), which provides employees with a straightforward process for raising serious and genuine concerns aimed at preventing malpractice within or affecting the organisation. During the Reporting Period, training on this policy was delivered by Legal Counsel via our learning management system in the form of a webinar.

The Whistleblower Policy can be accessed [here](#).

Code of Conduct

The Robert Walters Code of Conduct was re-written and published in 2023 with the intention of creating a unified global standard for Robert Walters Group. The release of the new Code of Conduct was accompanied by training delivered by local HR teams to ensure employees understood the updates and their application.

The Code of Conduct emphasises the importance of candidate care and outlines expected behaviours when engaging with candidates. This includes guidance on managing candidate privacy, raising concerns with managers regarding human rights or ethical trading issues, and encouraging employees to speak up if a candidate appears distressed or vulnerable. These expectations reinforce our commitment to ethical recruitment practices and the early identification of potential modern slavery indicators.

Our Chief People Officer issues a global reminder to all employees regarding the Code of Conduct and expects every employee to familiarise themselves with its requirements. This ongoing communication supports a culture of accountability, transparency and respect across the organisation.

The Code of Conduct can be accessed [here](#).

Supplier Code of Conduct

Our Supplier Code of Conduct, published in January 2021, sets out the minimum standards expected of all suppliers engaged by Robert Walters. It requires suppliers to implement adequate measures to comply with legal, ethical, social and environmental requirements, as well as recognised best practice standards in Australia and internationally where applicable.

The Supplier Code of Conduct also makes clear that Robert Walters reserves the right to conduct compliance audits and request evidence of adherence to the Code. This requirement reinforces supplier accountability and transparency by ensuring suppliers actively monitor their own practices and those of any sub-suppliers within their supply chains.

Our Supplier Code of Conduct can be found [here](#).

Ethical Conduct Statement

We also maintain a global Ethical Conduct Statement designed to support the management of risks associated with modern slavery. The policy provides guidance for all employees on Robert Walters' expectations regarding ethical behaviour and responsible decision-making, and it establishes a clear foundation for professional and accountable conduct across the organisation.

The Ethical Conduct Statement can be accessed [here](#).

Human Rights and Social Accountability Policy Statement

Our global Human Rights and Social Accountability Policy Statement outlines Robert Walters' commitment to social responsibility and affirms our obligation to uphold the human rights of all individuals connected to our operations and supply chains. The policy emphasises fair and ethical employment practices, including the prohibition of forced labour and other forms of exploitation.

The Human Rights and Social Accountability Policy Statement can be accessed [here](#).

Corporate Social Responsibility Policy Statement

Robert Walters' Corporate Social Responsibility ("CSR") Policy Statement outlines the organisation's commitment, as a member of the United Nations Global Compact, to focusing on key areas of responsible business conduct, including:

- **Employees** – respecting employee values, providing safe and equitable working conditions, and ensuring equal opportunities;
- **Ethos** – promoting best practices in ethical behaviour and integrity across all aspects of our business; and
- **Suppliers and Partners** – treating suppliers fairly and embedding CSR principles into supplier relationships.

These focus areas are fundamental to Robert Walters' approach to sustainability and ethical practice, particularly in relation to working with suppliers to understand, assess and manage the risk of modern slavery, and to collaborate on minimising such risks where they may arise.

The CSR Policy Statement can be accessed [here](#).

Modern Slavery Red Flags – Quick Reference Guide

Robert Walters has developed an easy-to-use Modern Slavery Red Flags – Quick Reference Guide to support staff in recognising potential indicators of modern slavery. The guide is accessible through our Modern Slavery Policy on the Robert Walters website, enabling external stakeholders to review it as part of our broader commitment to transparency.

The Guide has been circulated across all internal communication channels to ensure staff in Australia and New Zealand are aware of its purpose and importance. It highlights the key signs recruitment consultants should look for when working with candidates, particularly during routine check-ins, and reinforces why vigilance is essential in identifying potential risks of modern slavery.

The Guide also links to our Modern Slavery Response Plan and Modern Slavery Incident Response Form, which outline the steps to take and processes to follow should a concern arise, including appropriate escalation and remediation pathways.

You can access the Modern Slavery Red Flags – Quick Reference Guide [here](#).

6. Additional Controls

Employee Assistance Program (EAP)

Temporary workers are reminded at multiple points throughout their engagement that Robert Walters offers access to the EAP. The EAP provides independent, confidential support, and may serve as a safe channel for temporary workers who feel more comfortable disclosing concerns including potential indicators of exploitation to a neutral third party.

The availability of the EAP helps reinforce workers' rights, reduce the risk of social isolation, and encourage early reporting of issues that may relate to modern slavery risks. As such, the EAP forms part of the broader compliance and risk-mitigation measures implemented by Robert Walters to help safeguard workers' wellbeing and to support the identification of potential modern slavery concerns.

Supply Nation Partnership

Robert Walters' partnership with Supply Nation supports our commitment to ethical sourcing and contributes to reducing modern slavery risks within our supply chain. Supply Nation connects organisations with verified Indigenous-owned businesses in Australia, helping to promote fair economic participation for Aboriginal and Torres Strait Islander communities.

By engaging Indigenous-owned businesses that are subject to Australian labour laws and vetted through Supply Nation's verification processes, we help strengthen transparency and accountability in our procurement practices. These suppliers are significantly less likely to be associated with exploitative labour conditions, including modern slavery, due to the rigorous compliance and integrity standards required for Supply Nation certification.

This partnership enhances our responsible sourcing approach and supports broader social and economic outcomes for marginalised communities.

Contractual Obligations

Robert Walters continues to include a modern slavery clause in its supplier contracts, requiring suppliers to take reasonable steps to mitigate modern slavery risks within their own supply chains and to notify us if any such risks are identified. The clause also requires suppliers to represent and warrant that they are not aware of any modern slavery occurring within their operations, or within the operations of their subcontractors or suppliers.

In 2024, Robert Walters reviewed and amended its modern slavery clause to require suppliers to incorporate a corresponding clause in their own supplier and subcontractor contracts. The revised clause also clarifies that where a supplier fails to provide requested information relating to modern slavery risks, Robert Walters may exercise its right to terminate the contract.

These contractual requirements are an important mechanism for managing modern slavery risks not only within our Tier 1 supplier relationships, but also across Tier 2 suppliers and further throughout the broader supply chain.

Client due diligence

Robert Walters regularly participates in the due diligence processes conducted by its clients as part of their broader supply chain management frameworks. As a supplier of professional recruitment consultancy and advisory services, we work with a diverse client base, ranging from small businesses to global corporations, as well as various local, State and Federal government agencies across Australia.

Through this engagement, Robert Walters gains valuable insight into the actions taken by our clients to address modern slavery risks within their own operations and supply chains. This visibility contributes to our understanding of evolving market expectations, sector-specific risks, and emerging best practices in modern slavery risk management.

7. Training Awareness

Modern Slavery Mandatory Training

As noted above, Robert Walters requires all employees to complete mandatory training on the prevention of modern slavery. The course encourages employees to actively engage with suppliers and third-party agencies, including by asking questions that may assist in identifying modern slavery risks. This training is particularly important for staff in back-end operational roles such as office managers and marketing teams who frequently interact with potential suppliers.

The purpose of the modern slavery training is to equip employees with the knowledge and skills necessary to recognise and address potential modern slavery risks and to reinforce individual accountability across the business. Addressing modern slavery is a collective responsibility, and this training supports our organisation-wide efforts to mitigate risks.

All employees are required to complete an annual refresher of this training to ensure their knowledge remains current. The training is further supported by our Modern Slavery Red Flags – Quick Reference Guide, which provides practical guidance for employees on identifying potential indicators of modern slavery.

Mandatory Anti-Bribery Training

Robert Walters requires all employees to complete mandatory Anti-Bribery Training, recognising that bribery, corruption and modern slavery can share similar root causes, including power imbalances, unethical practices and a lack of transparency. This training supports a culture of accountability and reinforces respect for human rights across our operations.

The training addresses the risks and consequences of corruption, outlines the behaviours expected of employees, and includes a knowledge assessment to ensure understanding upon completion.

8. Response Mechanism

Robert Walters maintains a formal response mechanism comprising the Modern Slavery Response Plan and the Modern Slavery Incident Response Form. This mechanism provides a clear and structured process for individuals to report suspected modern slavery concerns.

The mechanism enables individuals to submit a report via the Modern Slavery Incident Response Form, which is then directed to Robert Walters' Legal team for assessment. The Legal team reviews the report, determines the appropriate escalation pathway, and implements remedial actions in accordance with the Modern Slavery Response Plan.

Our formal response mechanism is available through our Modern Slavery Policy and the Modern Slavery Red Flags – Quick Reference Guide, both of which are publicly accessible.

9. Supplier Due Diligence

Modern Slavery Questionnaire

Robert Walters continues to issue its Modern Slavery Questionnaire annually to all Tier 1 suppliers. We maintain internal systems that track supplier relationships and transactions, enabling us to identify all relevant suppliers and ensure the questionnaire is sent to the correct contacts. During the Reporting Period, this supplier list was expanded to include additional contact details and key information for each supplier to streamline the questionnaire distribution process.

The objective of the questionnaire is to gather information on how suppliers are identifying, managing and mitigating modern slavery risks within their own operations and supply chains. This enables Robert Walters to assess whether suppliers are taking appropriate measures to prevent modern slavery and to understand any areas requiring further engagement.

Second Tier Supplier Assessment

During the prior reporting period, Robert Walters introduced an enhanced supplier questionnaire that included additional questions targeted at suppliers operating in higher-risk industries, such as cleaning, security, hospitality and food services. During the current Reporting Period, we continued this assessment process, issuing the updated questionnaire and further refining our approach.

These higher-risk suppliers were asked to provide information about their own suppliers (second tier), along with a relevant website or contact details, enabling our Modern Slavery Officer to undertake further follow-up and risk assessment where needed. While several suppliers provided

the requested information, we contacted others directly via email to obtain additional clarification to ensure completeness and accuracy of responses.

We also engaged directly with key suppliers in categories such as office stationery and plant/office maintenance to obtain second-tier supplier information. This continued work has strengthened our supplier mapping processes and increased visibility into second-tier supply chains, supporting a more comprehensive understanding of potential modern slavery risks.

Supplier Mapping

As outlined above, Robert Walters commenced its supplier mapping activities in 2024, focusing on outsourced services that may be more vulnerable to exploitation, as well as suppliers of office stationery and plant/office maintenance services. This work continued throughout the 2025 Reporting Period, with further efforts to understand the suppliers used by these businesses, including their locations, workforce profiles, wage compliance and employment practices. The objective of this mapping is to increase transparency across our supply chain and develop a clear reference point that enables us to assess and collaborate with suppliers to address modern slavery risks.

One of our key suppliers is Winc Australia Pty Limited, one of Australia's largest workplace suppliers and a reporting entity under the *Modern Slavery Act 2018* (Cth). Winc maintains an Ethical Sourcing Team dedicated to addressing modern slavery risks and operates under an Ethical Sourcing Policy guided by the UN Declaration of Human Rights, ILO Conventions, and the Ethical Trading Initiative Base Code. This policy sets mandatory compliance obligations for suppliers and is implemented in accordance with applicable laws.

Winc sources goods from second-tier suppliers in various countries and applies a risk-based approach to supplier management, including:

- conducting third-party audits for medium- to high-risk suppliers;
- implementing corrective action plans where non-compliance is identified; and
- terminating supplier relationships where non-compliance cannot be resolved.

Robert Walters has incorporated Winc's practices, supplier locations, and risk-management processes into its own supplier mapping model.

We will continue to monitor and engage with Winc to ensure alignment with our ethical sourcing expectations.

The Robert Walters supplier mapping project remains a work in progress, and we acknowledge that further refinement and expansion are required. We remain committed to strengthening this process as part of our ongoing due diligence efforts to identify and mitigate the risk of modern slavery within our broader supply chain.

Self-Assessment Questionnaire

We also maintain an onboarding questionnaire that is issued to all new suppliers, requiring them to provide information about their operations and supply chains.

The purpose of this questionnaire is to assess whether prospective suppliers meet Robert Walters' ethical, legal and modern slavery-related requirements before they are formally engaged. Supplier responses form part of our due diligence process, and acceptance as a supplier is conditional on providing satisfactory responses.

10. Internal Audits

Robert Walters maintains high standards regarding human rights across both its internal operations and external service delivery. Each year, the internal HR and Payroll teams conduct salary and wage audits to ensure all employees receive at least the minimum wage, applicable penalty rates, and superannuation entitlements as required under Australian law.

Robert Walters' internal systems, including its payroll systems, are designed to prevent the underpayment of candidates and permanent staff. These systems operate as a preventative control to reduce the risk of non-compliance with workplace laws and to support broader efforts to mitigate potential modern slavery risks associated with wage exploitation.

11. Candidate Care

Robert Walters' recruitment consultants are committed to maintaining exceptional candidate care. We maintain regular contact with all candidates placed in temporary roles, conducting periodic check-ins to identify any unfair or inappropriate treatment by clients. We also do check-ins for up to six months on permanent placements. Some of our offices also have dedicated candidate management teams that ensure ongoing engagement with candidates, including those in long-tenure assignments.

Our consultants and candidate management teams receive detailed training on the types of questions to ask candidates about their roles, workload, working hours and whether the job aligns with their expectations. This enables the early identification of potential indicators of poor health, unsafe working conditions or mistreatment. By maintaining proactive communication and providing structured support, we help ensure candidates have a safe environment to raise concerns, including those that may relate to modern slavery risks.

12. Assessing Effectiveness

Number of complaints

Robert Walters provides multiple avenues for candidates, temporary workers and its employees to raise concerns relating to pay, working conditions, or any issues that may indicate modern slavery risks. During the Reporting Period, Robert Walters did not receive any complaints from candidates or staff in relation to matters that could result in, contribute to, or indicate potential modern slavery risks.

There were zero complaints in both the current and the previous Reporting Periods.

Regular reviews of internal processes

Our business teams continually assess how they can improve Robert Walters' operations. We conduct regular reviews of our internal processes, systems and databases, along with the policies we share with staff and external stakeholders. These reviews help ensure that our practices remain up to date, effective and aligned with our commitment to identifying and addressing modern slavery risks.

Internal audits and reviews

Our internal Payroll team conducts monthly reviews of processed payments to ensure that temporary workers paid a fixed hourly rate are better off overall than they would be if paid in accordance with any applicable modern award. This review process helps identify and prevent potential underpayment, which is a key factor in mitigating modern slavery risks associated with wage exploitation.

During the Reporting Period, Robert Walters' Payroll Manager identified zero instances of underpayment.

Questionnaire Responses

Our Modern Slavery Questionnaire is an effective tool for identifying potential risks within our supply chain and determining which suppliers may present higher-risk profiles. The responses received during the Reporting Period did not reveal any obvious risks or issues that would warrant further escalation or termination of a supplier relationship.

We will continue to issue the Modern Slavery Questionnaire on an annual basis to our existing suppliers, and the Self-Assessment Questionnaire will be sent to all new suppliers as part of our onboarding process.

13. Our Goals

Robert Walters is committed to continue strengthening its anti-modern slavery practices. In our previous Statement, we identified goals to guide our progress, including a commitment to conduct audits on business enablement services supported by employees outside Australia through our related entity, and to develop a KPI Checklist to assist in assessing the effectiveness of our actions.

During the 2025 Reporting Period, we made progress toward these goals, including advancing preliminary audit scoping work and beginning the design of the KPI Checklist. However, we acknowledge that further work is required to fully embed these initiatives and to continue transitioning from a compliance-focused approach toward a more impact-driven model.

Robert Walters has set out risk management goals that it intends to achieve over time, divided into short-term and long-term priorities:

- Short-term goals include actions we aim to undertake in the next reporting period, using our best endeavours.
- Long-term goals reflect actions planned over the next five years to strengthen our approach to identifying, managing and mitigating modern slavery risks.

We remain committed to progressing both sets of goals and will continue to refine and expand them as part of our ongoing improvement efforts.

SHORT-TERM GOALS	LONG-TERM GOALS
<i>Role-Specific Modern Slavery Training</i> Robert Walters will introduce targeted modern slavery training for employees in recruitment, procurement, finance and other high-impact roles to strengthen their ability to identify and respond to modern slavery indicators, while further expanding modern slavery awareness across the business.	<i>Supplier Training</i> Robert Walters aims to create training for suppliers on supplier obligations in accordance with the Supplier Code of Conduct and contractual requirements.
<i>Enhanced Supplier Risk-Rating Framework</i> Robert Walters will develop and implement an enhanced supplier risk-rating framework to categorise suppliers based on their modern slavery risk profile and to better prioritise due diligence activities.	<i>Establish a Modern Slavery Audit & Risk Committee</i> Robert Walters will put together a Modern Slavery Audit & Risk Committee to ensure modern slavery actions are continually improved and clear metrics are put in place to measure the impact of anti-modern slavery actions.

14. Approval

This statement was approved by the board of Robert Walters Pty Ltd on 11 March 2026.

Signed by

Signed by:

A handwritten signature in black ink that reads "Daniel Rogers". The signature is written in a cursive style with a large 'D' and 'R'.

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Daniel Rogers
Managing Director - Australia

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