

# MODERN SLAVERY POLICY & STATEMENT

## Modern Slavery Policy & Statement

### Introduction

u&u 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 u&u' obligations and compliance in relation to the "Modern Slavery Act 2018 (Cth)" ('the Act') and applicable state legislation 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.

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

### u&u structures and operations

u&u is part of the Will Group: a collective of 9 human resource organisations. u&u have 5 offices across Australia, Brisbane Head Office, Sydney CBD, Western Sydney, Melbourne and in June 2022 we launched in London.

u&u specialises in permanent, contracting and project recruitment across multiple sectors including Accountancy & Finance, Legal, Business Support, Construction & Property, Cyber, Procurement and Supply Chain, Engineering, Executive & Board, Human Resources & HSE, Marketing and Communications, Mining, Sales, Technology and Digital.

u&u currently employs over 100 direct staff with average experience of 13 years. We have 464,000 candidates registered with us and work with over 850 clients. In the past 12 months, we have successfully placed 2300 candidates.

The u&u modern slavery policy is a joint statement that covers u&u Holdings Pty Ltd, u&u Pty Ltd, u&u NSW Pty Ltd and u&u GWS Pty Ltd. The ultimate parent company of the u&u group is Will Group, Inc. a Japanese listed company. The u&u entities use the same policies and processes, operate in the same sector and have many shared suppliers. The modern slavery statement has been prepared on a consolidated basis to address modern slavery risks across all u&u entities.

Modern slavery can take on many forms including the trafficking of people, forced labour, child labour, servitude, and slavery. We take 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 licencing 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, and supply chain.

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### Suppliers to u&u

We contract with third parties who provide services to assist with the everyday running of our business, such as IT service providers, administration and facilities 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 risks 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 u&u 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

u&u 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 payroll team who audit the relevant modern award 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 u&u management on an ongoing basis.

#### Supplier Code of Conduct

u&u created a Supplier Code of Conduct that is relevant to all suppliers to u&u. Suppliers are expected to adhere to the u&u 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 supplier and business partners and the communities affected by the suppliers' operations.

u&u' 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

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- 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.

### **Co-operation 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, u&u is familiar with participating in clients' audits of their respective supply chains. In doing so, u&u is also able to observe its client's own practices on the prevention of modern slavery.

### **Engagement with Suppliers**

During the reporting period, u&u engaged with various companies that provide services to our u&u office network. This involved providing copies of u&u Supplier Code of Conduct to these suppliers and enquiring as to the modern slavery compliance practices and procedures.

### **Reviewing contractual documentation**

u&u review its standard form and client contract annually to include specific references to modern slavery law compliance.

### **Ability for employees to raise concerns at work**

All u&u employees have access to dedicated channels through which they may voice concerns, either through local reporting mechanisms or through whistleblowing procedures. u&u 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 u&u can assess the effectiveness of its practices and procedures.

### **Training**

All staff within u&u 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 a review of our policies and procedures to ensure our colleagues have access to any additional information and support they may

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require regarding human trafficking, forced labour, child labour, servitude and slavery.

### **Assessing the effectiveness of the actions taken**

In the 2021-2022 reporting year, u&u did complete the tasks set out to achieve above. Our assessment of the effectiveness of those tasks is as follows:

#### **u&u Supplier Code of Conduct**

u&u created and published its Supplier Code of Conduct, a formal company document requiring u&u suppliers to operate ethically, professionally, and to be legally compliant in all respects including, relevantly, in relation to modern slavery. The document is furnished to u&u recruitment services suppliers (that is, second-tier suppliers who assist u&u in providing u&u recruitment and managed services to u&u clients) and to our office services suppliers (being those suppliers who provide services linked to our facilities management requirements). u&u will continue to do so.

#### **Publish changes made to u&u standard form contracts**

u&u updated its suite of standard form contracts furnished to clients to explicitly require mutual compliance with modern slavery legislation.

The contracts were also updated to contemplate and procure compliance with related laws, such as anti-bribery and corruption, and continue to require full compliance with local work health and safety laws.

Following the engagement with the commercial cleaners of a number of u&u offices, engage with various suppliers of firstly, IT products and services, and secondly, office supplies, to the u&u office network to assess their modern slavery policies and processes.

Suppliers were required to confirm their acceptance of and compliance with u&u' new 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 the supplier was aware of Commonwealth modern slavery laws 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, and no modern slavery breaches were disclosed by suppliers or otherwise identified by u&u.

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### Looking forward

Over the next reporting period, u&u will again continue to assess ways to reduce the risks of modern slavery. u&u intends on taking the following steps over the next 12 months:

- Conduct an audit of current suppliers to assess their modern slavery policies and processes
- Provide training to employees on modern slavery laws

This statement is made pursuant to the Act and constitutes u&u slavery and human trafficking statement in respect of the 2022-23 reporting year and is approved by the principal governing body of u&u.

### Approval

This statement was approved by the Board of Directors for u&u Pty Ltd at the u&u board meeting on the 18<sup>th</sup> of September 2023.

Craig Sneesby, Managing Director



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18/09/2023