



# Hays Australia Policy for The Prevention of & Reporting on Modern Slavery

Statement for 2024 - 2025 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 of 30 June 2025, Hays Australia employed over 859 direct staff operating in 25 offices in each State and Territory of Australia. For the 2024-25 financial year Hays in Australia placed around 4300 into permanent jobs, and also filled over 32,000 temporary jobs, paying an average of 11,000 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; Energy; Engineering; Executive; Facilities Management; Human Resources; Insurance; Technology; Life Sciences; Logistics; Manufacturing & Operations; Marketing & Digital; Office Support; Oil & Gas; Policy & Strategy; Procurement; Property; Resources & Mining; Response Management; 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 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 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, meat processing industry and horticulture industry in certain states.

### **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 & 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. As part of its standard onboarding process, Hays issues 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 includes specific references to modern slavery law compliance. We will continue to review and update those terms whenever required and otherwise whenever appropriate.

## 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 2024-25 statement is as follows.

### Think Beyond Initiative – 2025

In 2025, we strengthened engagement through the Think Beyond initiative, empowering colleagues to turn ideas into action. A key milestone was the Your Voice 2025 survey, launched in September and open for three weeks, giving our colleagues the chance to share feedback on culture, working conditions, and career development.

This year, we refined the survey format to keep it focused and relevant, introducing fewer but more targeted questions that reflect our evolving business and help track progress toward the culture we're building. Insights from the survey reinforced the impact of these initiatives, with engagement across APAC rising to 70%, up 5 points from last year. Standout strengths included manager approachability (85%), autonomy (83%), and a strong understanding of how individual work supports Hays' goals (85%). These results demonstrate that actions such as enhanced benefits and wellbeing programs are driving meaningful cultural improvements, even as we continue to focus on career development and clarity on global strategy.

## Strengthening Governance This Year

In 2025, we enhanced our governance framework by introducing a new process for submitting contract, legal, and bid review requests. All requests now flow through Freshservice via the Service Catalogue or the Contracted Client Hub, email submissions are no longer accepted. This change seeks to streamline workflows, improve visibility, and enable richer data insights for compliance and decision-making. We also refined the request form to ensure the right questions are asked at the right time, supporting stronger governance and ethical client partnerships.

## Focus on Audit

Hays remains committed to preventing modern slavery and human trafficking across our operations and supply chains. Accordingly, as outlined in our previous statement, in 2024/25 we strengthened due diligence processes and conducted targeted audits of high-risk suppliers and related entities, selected based on the volume and value of services procured.

## Targeted IT Supplier Audits

Following the outsourcing of Hays' ICT function under a global partnership, we audited key IT suppliers, including Cognizant Technology Solutions Corporation and Lexmark. Each completed a comprehensive questionnaire assessing compliance with Commonwealth modern slavery laws, supply chain oversight, employment documentation, anonymous reporting mechanisms, and plans for future improvement. Lexmark confirmed acceptance of Hays' Supplier Code of Conduct and provided its Human Trafficking and Slavery Statement, while Cognizant acknowledged compliance and reaffirmed its commitment to prevention. Engagement was satisfactory, and no breaches were identified or disclosed.

## 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

## Establishment of a Risk Committee

The goal of the Risk Committee was to provide a platform for senior staff members to identify and discuss actual and potential risks presented to our business, including matters relating to employee wellness. A recurring agenda item within this meeting is modern slavery so that the topic remains top of mind to senior staff and any issues or updates are provided in this meeting for review and action if required.

## 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

Over the next reporting period, Hays will continue to strengthen its approach to reducing modern slavery risks and embed more formal governance processes. Having now completed several 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 to take the following steps over the next 12 months:

### To advance ESG Integration and Global Audit Standards

In 2026, Hays will build on its modern slavery compliance program by integrating broader ESG considerations into supplier due diligence. This includes standardising global audit practices, enhancing supplier onboarding and monitoring, and introducing measurable ESG KPIs to strengthen transparency and improve our EcoVadis score. These steps will ensure a consistent, best-practice approach across regions while maintaining our commitment to ethical and sustainable operations.

### To carry out Facilities Management Supplier Audits

Hays will expand its audit program to include Facilities Management Suppliers, recognising the potential modern slavery risks associated with outsourced services. These suppliers will be selected based on the scale and criticality of services provided and will complete a comprehensive questionnaire assessing compliance with modern slavery laws, supply chain transparency, employment practices, and grievance mechanisms. This initiative forms part of our broader commitment to strengthen due diligence and align with global ESG standards.

### To increase and maintain opportunities for employees to raise concerns and for risks to be identified

We will continue to improve on the following initiative:

The Voice of Colleagues – Initiative aims to empower all Hays colleagues to collaborate and shape ideas into action. The 'Your Voice' survey also provides employees with an opportunity to submit feedback on areas including working conditions, culture, and career concerns.

## Continued practices

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

- 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
- Additionally, Hays will leverage its established Risk Committee to oversee modern slavery compliance and related governance matters, ensuring that risks are identified and addressed promptly.

**This statement is made pursuant to the Act and constitutes Hays' slavery and human trafficking statement in respect of the 2024-25 reporting year and is approved by the principal governing body of Hays, being its board of directors.**

**Signed:**



**Matthew Dickason**

CEO, Asia Pacific

Hays Specialist Recruitment (Australia) Pty Limited