



Michael Page International (Australia) Pty Ltd  
**Modern Slavery Statement**





## Modern Slavery Statement

Michael Page International (Australia) Pty Ltd's (**Michael Page Australia**) purpose is to change lives through creating opportunity for people to reach their potential by bringing the world's best employers and the brightest professionals together. We do not tolerate, support or engage in acts of modern slavery and human trafficking occurring within our business and supply chain.

We expect our people, our suppliers, and their employees, whether permanent or temporary, to be treated with respect and dignity at work. At Michael Page Australia, we believe employment should always be chosen; there must be no forced, bonded, or involuntary labour. Employees must not be required to lodge monies or identity papers to be able to work and must be free to choose to leave employment.

This statement has been prepared by Michael Page Australia to meet the requirements of the *Modern Slavery Act 2018* (Cth). It covers the period 1 January to 31 December 2023 and explains the work we have undertaken to address modern slavery risks within our business since the 2022 reporting period and the steps we intend to take over the coming year.



## Background

Modern slavery is a global issue which can affect any business in any sector and is often very difficult to detect. We recognise, and take very seriously, the risk of modern slavery in our business and our people are committed to taking steps to reduce this risk within our business and supply chain.

## Our structure and operations

Michael Page International (Australia) Pty Ltd ACN 58 002 872 264 is an Australian Proprietary Company, limited by shares that specialises in recruitment consultancy in Australia. We have over 35 years of experience and approximately 218 internal employees in Australia, with annual revenue of approximately \$212 million.

PageGroup plc is the ultimate holding entity of Michael Page Australia. The PageGroup group of companies' trades under the core brands of PAGEGROUP, PAGE EXECUTIVE, MICHAEL PAGE, PAGE PERSONNEL and PAGE OUTSOURCING. Michael Page Australia does not own or control any other entity.

Our registered office is at Level 21, 9-13 Castlereagh Street, Sydney NSW 2000. We specialise in mid-to senior-level professional and management recruitment for permanent, temporary, and contract roles as well as for office and administrative workers for both the private and public sector.



## Our supply chains and risks of modern slavery practices

As an Australian provider of professional recruitment services, we consider our supply chain to be relatively simple in comparison to many other industries, as we are not directly involved in overseas labour or manufacturing.

We work with a small range of suppliers who provide goods and services across several different categories. We recognise there is risk of Michael Page Australia being indirectly linked to modern slavery, as our suppliers may source products or raw materials from overseas companies connected with modern slavery.

Michael Page Australia is focused on the recruitment of mid to senior level roles, rather than low skilled labour. As part of our business, we have direct control over the sourcing and supplying of temporary personnel to clients. We recognise that across Australia, temporary workers face higher risks of exploitation and may be more likely to be subject to modern slavery practices.

Our supply chain includes the third-party services provided to Michael Page Australia directly by supply of goods, facilities services, and professional services. We engage various Australian-based providers to provide cleaning, waste management and maintenance services to our Australian offices. While the labour provided by our suppliers is sourced in Australia, we recognise that cleaning, waste management and maintenance services are high risk sectors. By engaging these services through a third party we may be indirectly contributing to modern slavery practices.

In addition, products used by our suppliers may be sourced both in Australia and overseas. It is possible that some of our supplier's products, or their components, may be sourced from countries and industries where there is some risk of being linked with modern slavery.

Michael Page Australia considers there is a relatively low risk of causing, or contributing to, modern slavery in its operations and supply chains.



## Actions to assess and address the risks of modern slavery

We conduct risk assessments on our supply chains on an ongoing basis. At the time of preparing this statement, we consider there is a relatively low risk of labour exploitation or other forms of modern slavery and human trafficking occurring within it.

We are assessing and addressing the risk of modern slavery practices occurring within both our business and our supply chain by taking the following actions:

### Our policies

All employees of Michael Page Australia are required to comply with Michael Page Australia's Modern Slavery Procedure. The Modern Slavery Procedure sets out, among other things, Michael Page Australia's methodology for managing modern slavery risks, including the implementation of a Modern Slavery Vendor Risk Assessment. The Modern Slavery Procedure assists Michael Page Australia to manage risks to workers in the supply chain and to ensure compliance with the Supplier Code of Conduct, applicable legislation and regulatory requirements, including those related to modern slavery and human trafficking.

Employees are also required to comply with the Employee Code of Conduct (**Employee Code**), which makes clear that Michael Page Australia will not tolerate, engage in, or support the use of forced labour.

Third parties, consultants and contractors who provide goods and services to or on behalf of the Michael Page Australia continue to be required to comply with our Supplier Code of Conduct (**Supplier Code**). The Supplier Code promotes our standards within the supply chain and reflects our commitment to acting ethically and with integrity in business dealings and relationships. We expect our suppliers to have processes in place to support meeting the standards set out the Supplier Code and to provide supporting evidence if requested.

Michael Page Australia encourages staff to speak up, is receptive to feedback from staff and customers, and is committed to continuous improvement. Michael Page's Speak Up (Whistleblowing) Policy assists in preventing modern slavery and human trafficking by providing our people with a mechanism to speak freely about our practices and raise any concerns.

In this reporting period, Michael Page Australia reviewed its Modern Slavery Awareness Training to ensure it remains legally compliant, up-to-date and relevant.



## Due diligence

### Within our own business

Michael Page Australia prohibits the use of forced labour and human trafficking. Michael Page Australia has in place several procedures to proactively manage risk, including robust recruitment processes in line with Australian employment laws. Michael Page Australia also provides an external confidential whistleblowing helpline which employees are encouraged to use to report any concerns.

In 2022, a primary focus of Michael Page Australia was strengthening due diligence within our own business. Michael Page Australia understands the importance of continuing to update and monitor due diligence activities and in 2023, we have undertaken various key activities which include but are not limited to:

- (a) published all relevant policies and procedures, ensuring that all new employees familiarised themselves with the Modern Slavery Procedure;
- (b) a review of all relevant policies and procedures including WHS procedures, Modern Award improvements and improvements to induction programs for our workers;
- (c) continued to promote the avenues for customers and workers to report incidents and make whistleblowing complaints, including via Michael Page's Speak Up (Whistleblowing) Policy, Speak Up service (external provider for anonymous reporting) and complaints policy (website);
- (d) reviewed and incorporated Modern Slavery in the Internal Audit tool and monitoring program to include modern slavery as part of our program with audits scheduled for the 2024 Audit period;
- (e) followed our risk management procedure to ensure we are continually reviewing modern slavery risks within our operations and supply chain and undertaking further evaluation based on risk;
- (f) reviewed our modern slavery awareness training presentation which targets all key stakeholders and employees; and
- (g) consulted with global entities to understand due diligence for Global procurement impacting Michael Page Australia.

## Due diligence

Michael Page Australia is committed to its purpose of changing lives by creating opportunities for individuals to achieve their potential. It is not just about what we do, it is about how we do it. To this end, Michael Page Australia consistently takes measures to ensure all employees receive their rightful employment benefits as per relevant industrial agreements and to maintain safe working conditions that adhere to our work health and safety commitments. This process includes assessing all sites for the safety, health and wellbeing of our workers.

In recognition of the risks associated with temporary workers, we continue to implement an additional system of checks and procedures which help to ensure temporary workers are protected from the risks of modern slavery. These checks and procedures include:

- (a) verifying temporary workers have a right to work in Australia for the duration of their assignment, by asking the individual to produce relevant identity documentation. A delay in providing proof of identity and/or associated right to work documentation might indicate a modern slavery issue and is escalated within the business as required;
- (b) conducting detailed reference checks to ensure individuals are hired in a role they are qualified to undertake;
- (c) conducting detailed background checks;
- (d) reviewing contracts to ensure they comply with all legal requirements regarding workers' rights;
- (e) ensuring temporary workers have a bank account in their own name into which their remuneration is paid;  
and
- (f) reviewing modern awards and industrial instruments to ensure temporary workers are paid correctly with a specialised team to audit new engagements and communicating relevant entitlements and information to candidates and clients.

# Due diligence

## Within our supply chain

We are committed to partnering with suppliers that share our view and stance on modern slavery.

As part of our local initiative, we have undertaken the following due diligence procedures with respect to our suppliers:

- (a) utilised the continuous review process in our Modern Slavery Procedure to evaluate modern slavery risks for new and considered whether any existing suppliers should be identified as 'higher risk' in our initial review process;
- (b) considered the general risk profile of the procurement or supplier relating to modern slavery compliance before engaging or renewing an existing contract for a supplier to ensure that we have similar expectations and commitments to modern slavery;
- (c) provided all new and existing suppliers with our Modern Slavery Statement, Supplier Code of Conduct and obtain relevant supplier documents;
- (d) requested confirmation from new and existing suppliers that they will adhere to our standards;
- (e) developed modern slavery clauses in terms of business requiring suppliers of Michael Page Australia where a legal review is required based on risk classification;
- (f) implemented a formal process for business consultation which requires consultation to occur at various times, including prior to a vendor contract being signed to identify high modern slavery risks.

Our approach facilitates the identification and assessment of potential risk areas in our supply chain in relation to modern slavery and human trafficking. We act to mitigate these risks through the implementation of effective actions, controls and risk mitigation strategies. We understand that identifying and mitigating existing risks in our operations and supply chain are ongoing activities and we continue to monitor and regularly review the effectiveness of our actions, controls and risk mitigation strategies to ensure that any emerging risks are identified.





## Audit and Compliance

Michael Page Australia continues to evaluate the nature and extent of its exposure to the risk of modern slavery occurring in its business and supply chain. Specifically, on an ongoing basis, Michael Page Australia:

- (a) has incorporated Modern Slavery in the Internal Audit tool and monitoring program to include modern slavery as part of our program with audits scheduled for the 2024 Audit period; and
- (b) consults with senior leaders and its local procurement teams to ensure the organisation has robust and effective processes regarding modern slavery risk and compliance.

In this reporting period, Michael Page Australia incorporated an instrument into its audit tool which will track Michael Page Australia's modern slavery performance during the reporting period and factor this in to localised audits where relevant. These audits have been scheduled for the upcoming reporting period and Michael Page Australia will continue to strengthen the effectiveness of its audits.

Our core business is focused on the provision of recruitment services in respect of professionals, office and administrative workers, rather than the agriculture, retail or manufacturing sectors, which are sectors we perceive to present a higher risk of labour exploitation and modern slavery.



## Further steps

We intend to take the following steps in relation to modern slavery and human trafficking during the course of the 2024 reporting period:

- (a) utilise the audit tool which will track Michael Page Australia's modern slavery performance during the reporting period and factoring this in to localised audits where relevant;
- (b) continue to review our modern slavery awareness training and track attendance to ensure it remains legally compliant, up-to-date and relevant;
- (c) consult and review responses provided by global entities to understand due diligence for Global procurement impacting Michael Page Australia for any ongoing improvements and alignment;
- (d) develop and provide modern slavery guides to assist suppliers in understanding the impacts of modern slavery and Michael Page Australia's zero tolerance for modern slavery;
- (e) create a mandatory modern slavery training module for new employees so they understand Michael Page Australia's expectations and so that they develop the appropriate level of understanding as to why Michael Page Australia is committed to taking steps to address modern slavery;
- (f) review and update Field Handbooks to include information regarding the impacts of modern slavery, so that our temporary employees have awareness of our key policies and processes; and
- (g) require any suppliers identified as 'high risk' to recomplete the Modern Slavery Questionnaire.



## Assessing the effectiveness of our actions

To assess the effectiveness of our actions we:

- (a) conduct external audits of our suppliers, to ensure compliance with the Supplier Code, identify any modern slavery risks and assess the effectiveness of the actions implemented to mitigate the risks of modern slavery;
- (b) conduct internal audits across our business to ensure our actions are implemented and effective;
- (c) identify changes to modern slavery risks and take steps to determine how risks are best addressed;
- (d) will conduct annual senior management reviews at Board level to assess the actions we have taken to mitigate the risk of modern slavery;
- (e) keep a record of the actions taken by Michael Page Australia and suppliers in relation to modern slavery; and
- (f) maintain records for completed modern awareness training.

This statement is made pursuant to section 16 of the *Modern Slavery Act 2018* (Cth) and has been reviewed and approved by the Board of Michael Page Australia on 28 June 2024.

### MICHAEL PAGE INTERNATIONAL (AUSTRALIA) PTY LTD

**Sharmini Wainwright**  
Senior Managing Director  
28 June 2024

**David George**  
Senior Managing Director  
28 June 2024