

# Modern Slavery Statement

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## Introduction and Statement from Recruitment Hive

This Modern Slavery Statement has been prepared by Recruitment Hive (13 155 397 541) pursuant to the *Modern Slavery Act 2018 (Cth)*. Our voluntary publication of and participation in the development of this statement, is an example of how we as a company are committed to being market leaders and assist with driving change in a positive manner. This is part of our Mission Statement. It is our belief that our suite of Modern Slavery documents and resources, outline our expectations regarding behaviours pertaining to modern slavery practices in our business and supply chains. Further, our submission of the statement demonstrates our continued commitment to ensuring conduct that condemns modern slavery.

## 1. Structure and Operations

Recruitment Hive is a recruitment and labour hire agency, operating in Australia. Recruitment Hive was established in 2012 and has grown from a staff of two with zero ICT contractors to a team of 18 internal team members and 300 ICT contractors across Australian Federal Government in 2023. The core function of the Recruitment Hive relates to the supply of labour-hire services acting to engage Recruitment Hive casual employees and sub-contractors with client worksites across Australia. Recruitment Hive provides specialist ICT professionals to both Federal Government and private enterprises.

## 2. Supply Chains

Recruitment Hive recognises that our employees and sub-contractors are the primary resource used to provide services to our clients. To provide these resources, Recruitment Hive engages with a limited number of suppliers, as listed below:

- CRM software
- IT Hardware and consulting services
- Financial and insurance services
- Professional advisories

### 3.Risks of Modern Slavery Practices

The term *modern slavery* describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Coercion, threats, and deception can be explicit or implicit.

The *Modern Slavery Act 2018 (Cth)* 'ACT' defines modern slavery as including eight types of serious exploitation; trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services. The worst forms of child labour mean extreme forms of child labour that involve the serious exploitation of children, including through enslavement or exposure to dangerous work. The worst forms of child labour does not mean all child work.

Under Australian law, modern slavery is defined in the Act. In the event of any inconsistency, the definitions in the 'ACT' take precedence over this statement and Recruitment Hive's Anti Modern Slavery policy document.

Recruitment Hive has conducted a risk assessment of our modern slavery risks within Recruitment Hive offices and client worksites. Through this assessment, Recruitment Hive has determined that our risk in relation to modern slavery is **LOW** and make the following explanatory submissions:

Modern Slavery Risk	Risk Assessment	Explanation
Forced labour	LOW	<p>The majority of Recruitment Hive's clients are governed by modern slavery legislation, have published their own Modern Slavery Statement and adhere to their reporting obligations.</p> <p>Recruitment Hive representatives ensure that all client engagement agreements contain terms and conditions which adhere to modern slavery legislation. These contractual agreements identify specific responsibilities and commitments which act to combat modern slavery. These measures include published policies and guidelines specific to the site and operations.</p> <p>Recruitment Hive commits to replying to any and all modern slavery due diligence questionnaires and expects reciprocal commitment from our clients. This collaborative exchange of information affords Recruitment Hive</p>

			the ability to ensure ethical standards are upheld.
Deceptive Recruitment Practices	Recruitment	LOW	<p>Recruitment Hive ensures that all recruitment consultants engage in comprehensive training in specific regard to ethical and legal obligations when representing employees, sub-contractors and clients. In this regard, training provides our employees with the essential knowledge to ensure continued compliance. As such, misleading or deceptive conduct are viewed as a dismissible offence.</p> <p>Recruitment Hive maintains a relationship with providers of software used to advertise Recruitment Hive's services and availabilities. These providers, such as <a href="http://www.seek.com">www.seek.com</a>, have invested mechanisms which combat misleading or deceptive practices.</p>
Wage Underpayment		LOW	<p>Recruitment Hive has implemented a framework which acts to ensure that every employee and sub-contractor is remunerated above published award rates in line with relevant workplace legislation.</p> <p>In the absence of a published award, Recruitment Hive's internal controls ensure that all employees and sub-contractors are paid above the closest rate for comparable functions.</p>

## 4.Actions Recruitment Hive takes to address risks of Modern Slavery Practices

Recruitment Hive has implemented and maintains a number of mechanisms to address risks of modern slavery as listed below:

- Recruitment Hive's Code of Conduct,
- Misconduct Policy
- ICT Contractor Ethics and Integrity Policy
- Whistle-blower Policy

Note these are not an exhaustive list of policies, however, act as fundamental guidance for employee behaviours, publish expected standards and provide advice in relation to reporting procedures. Recruitment Hive regularly reviews and revises these and all other policies to

ensure continued compliance and best practice standards. This revision process enables Recruitment Hive to identify gaps, which allows us to address risks as necessary.

<p><b>Policy Framework</b></p>	<p><b>Code of Conduct: HIVE_POL_009</b> Recruitment Hive’s Code of Conduct identifies our commitment to maintaining a high standard of ethical conduct. This Code of Conduct clearly details the expected practices of all employees, including compliance, mandates, anti-harassment and equal opportunity.</p> <p><b>Misconduct Policy: HIVE_POL_017</b> Recruitment Hive’s Misconduct Policy provides employees and sub-contractors with protocols to manage and report misconduct. The Misconduct Policy has been developed in line with the Code of Conduct and other Human Resource policies which set out expected employee behaviours.</p> <p><b>Anti Modern Slavery Policy: HIVE_POL_026</b> Recruitment Hive Anti-Modern Slavery Policy outlines expected behaviours pertaining to modern slavery practices in our business and supply chains. Combined, these serve to demonstrate our commitment to and underpin our annual Modern Slavery Statement and the provision of protection and support to our employees and clients. Further, limiting modern slavery practices is good business sense and protects workers and Hives reputation. It also supports Hive assess and address modern slavery risks as required by Commonwealth modern slavery legislation - <i>Modern Slavery Act 2018 (Cth)</i>.</p> <p><b>ICT Contractor Ethics and Integrity Policy: HIVE_POL_024</b> Recruitment Hive has developed a purpose driven policy to ensure all employees and sub-contractors adhere to ethical standards and maintain a high standard of professional integrity, The Ethics and Integrity Policy expands on the established standards expected of all Recruitment Hive employees and sub-contractors published within the Code of Conduct, Misconduct Policy and other Human Resource policies.</p> <p><b>Whistle-blower Policy: HIVE_POL_020</b> Recruitment Hive’s Whistle-blower Policy provides further assurances of our commitment to honesty, integrity and ethical standards.</p>
<p><b>Due Diligence</b></p>	<p>Recruitment Hive offers a comprehensive response to client requests for a completed modern slavery due diligence questionnaire. Our reply to these requests assists our clients to identify and assess risks of modern slavery within their own supply chain.</p> <p>Recruitment Hive acknowledges that this questionnaire is non-exhaustive and that we may be required to provide additional information.</p>

	Recruitment Hive works in conjunction with clients and requests information in respect to policies, procedures, reporting avenues and compliances.
<b>APSCo Membership</b>	Recruitment Hive utilises the relevant resource catalogues provided through its membership with APSCo (Association of Professional Staffing Companies) to mitigate risks of modern slavery within its practices.

## 5. Assessing Efficacy

Recruitment Hive is dedicated to a proactive approach toward assessing and addressing Modern Slavery risks and achieves this through multiple mechanisms as outlined below:

- **Regular revision of policies and procedures**  
Ensures continuous improvement and provides regular re-assessment opportunities
- **Development of multiple feedback channels**  
Encourages employees to engage with and comment on Recruitment Hive's approach to addressing modern slavery
- **Promotion and provision of opportunities for open communication**  
Encourages employees to report potential modern slavery risks or gaps in policy documents
- **Adherence to obligations enforced by Australian labour-hire authorities**  
Annual mandated reports provided to licensing authorities services to guarantee Recruitment Hive's ongoing commitment to responsible and ethical practices
- **Voluntary Modern Slavery Statement submission**  
Recruitment Hive's 2023 voluntary statement submission demonstrates our continued commitment to ensuring conduct that condemns modern slavery

## 6. Consultation

This statement is published by Recruitment Hive Pty Ltd, in consultation with senior management. Management engages monthly to discuss and address issues that are relevant to the day-to-day practices of Recruitment Hive. This includes discussions surrounding legal obligations such as those contained within the *Modern Slavery Act 2018 (Cth)* and other legislation.

## 7. Approval

Recruitment Hive's Modern Slavery Statement has been approved by senior management and managing directors/owners on 22<sup>nd</sup> July 2024.