

Modern Slavery Statement 2024/25

Who we are as an organisation

Hireup is an Australian NDIS-registered provider of disability support services, operating through an online platform where people with disability can find, hire and manage support workers who fit their needs and share their interests. At the time of reporting, we had more than 6,000 clients and more than 6,500 disability Support Workers across Australia approved to use Hireup's platform.

Hireup Support Workers are engaged as casual and permanent employees, to provide one on one support services to people with disability. Hireup is a national company with 300 office personnel working across Australia.

We submit this Statement on behalf of all operations of Hireup Holdings Pty Ltd (parent company) and Hireup Pty Ltd, both of which are reporting entities. The two companies operate in the same sector and share suppliers. Hireup policies and procedures are applicable to both. Hireup Holdings Pty Ltd and Hireup Pty Ltd created this Statement in collaboration with each other and are herein referred to as "Hireup".

Consultation

This Statement for the 2024 financial year period was developed through consultation between both entities and discussions on: the Modern Slavery Act, potential actions to mitigate against Modern Slavery risks, reporting requirements, and how to raise awareness of Modern Slavery internally and externally to Hireup.

The CEO and Executive Leadership Team of Hireup Pty Ltd and the Chair of Hireup Holdings Pty Ltd participated in the Statement's development and input was received from key business units including Trust & Safety, Legal, Risk, and Finance teams.

Combined oversight of the implementation of this Statement by the Hireup Pty Ltd Executive Leadership Team and the Hireup Holdings Board will ensure there is a consistent approach and commitment to its application across both companies.

Our activities

Hireup's key supply chains are:

- the provision of disability support services by Hireup's Support Workers; and
- procurement of products and services for use by Support Office personnel.

Our understanding of Modern Slavery risks for Hireup

Hireup's previous Statements have outlined the steps we have taken to understand the risk posed to Hireup by Modern Slavery. This has included supply chain mapping, which considers geographic origins, pricing index and total annual spend in assessing risk of our key suppliers.

Hireup's business operations remain largely unchanged since our last Statement. Since our last Statement Hireup has continued to provide other disability sector providers with access to Hireup's Support Workers (**Providers Venture**). This venture may create some additional, albeit low Modern Slavery risks; namely that a third party provider utilising Hireup Support Workers may engage in discriminatory, unethical or illegal workplace practices such as wage theft, unsafe working conditions or exploitative labour practices.

It remains our belief that the provision of support for people with a disability, either directly through Hireup, or through our existing partner providers does not create a significant risk of Modern Slavery.

Despite this belief, we continue to monitor Modern Slavery risks in our procurement of goods and services with particular focus on those goods and services which are identified as carrying higher risks of Modern Slavery such as, cleaning and maintenance services, garments such as staff t-shirts, and IT hardware and software.

How we are addressing Modern Slavery risks

Hireup has continued to progress and mature the implementation of our Modern Slavery framework across both entities and has assessed the processes put in place in the previous reporting period to address our Modern Slavery risks.

Changes to the *Modern Slavery Act 2018* (Cth)

Hireup is aware of the key changes proposed by Professor John McMillan AO, as part of the independent review of the *Modern Slavery Act 2018* (Cth) (Act). This section of

Hireup's Statement addresses those proposed changes and outlines how we are meeting the current compliance requirements, as well as moving to ensure we are compliant with the key recommendations for proposed changes to strengthen the reporting regime for Modern Slavery.

Lowering the reporting threshold to \$50 million

The proposed change will not impact Hireup Holdings Pty Ltd and Hireup Pty Ltd as our annual consolidated revenue in previous reporting years has been above the \$50M threshold.

Expanding the mandatory reporting criteria

The review recommended updating and strengthening the reporting criteria in the Act so that entities are required to more explicitly describe their approach to managing modern slavery. The review proposed three key areas to strengthen reporting. These are listed below, along with a description of Hireup's practices in this regard.

1. Modern slavery incidents or risks identified by the entity during the reporting year

Hireup undertakes a regular review of its material third party providers and suppliers. Due to the nature of our business, the provision of face to face disability service and support, we do not have suppliers that bring additional slavery related risks to the business.

Our suppliers and vendors largely provide administrative support, advice and consulting, banking and financial support or technology support in terms of the provision of tools and systems and applications in use at Hireup.

To assess the risks posed by our relationships with third party providers, Hireup's Enterprise Risk Team undertakes an evaluation of all of our material suppliers. This evaluation includes ensuring that our key suppliers have their own processes to manage modern slavery, and have a published Modern Slavery Statement or a published statement on ethics or human rights.

2. Grievance and complaint mechanisms made available by the entity

At Hireup, we are committed to conducting business with fairness, integrity and respect for the law, and in accordance with our core operating principles and our values. Hireup's Speak Up Policy codifies our position on whistleblowers. This policy is designed to ensure that our customers, employees, clients and other stakeholders know how to disclose any wrongdoing and are able to raise concerns safely and securely knowing all reports will be handled appropriately and you will be protected.

This policy is Hireup's way of ensuring that our people are protected by the laws which apply to whistleblowers. In that regard, any reference to "speaking up" takes on the same meaning as a whistleblower under applicable legislation.

Hireup has both Complaints and Incident Reporting enabled via our platform. This enables everyone to register a complaint or report an incident. Hireup publishes a [Statement on Complaints](#) on our platform to ensure that we are communicating the principles by which we operate and the process to report any issues. Our Statement on Complaints also provides links to the relevant state and federal external agencies that manage or support complaints resolution.

3. Internal and external consultation undertaken by the entity on modern slavery risk management.

As part of the annual review of Hireup's Modern Slavery Statement we undertake internal consultation with our leadership group and our Board to ensure that we have aligned our objectives and strategy with a zero tolerance approach to modern slavery risks.

We consult with all of our potential suppliers or vendors to ensure that they have an awareness of their obligations under the Act as well as systems or processes in place to minimise their own modern slavery risks.

Introducing a due diligence system obligation

The report tabled in Parliament contained a key observation that *"reporting should not be an end to itself"*, and that a due diligence system that went beyond the existing obligations was necessary to ensure greater compliance with the Act.

The key recommendations for that due diligence process are listed below, along with the steps that Hireup has taken historically that align with these proposed enhancements.

1. Identify and assess the risks of modern slavery practices in its operations and supply chains:
 - a. As described above Hireup manages the risk posed by modern slavery by undertaking an annual assessment of all of our vendors. This assessment takes into consideration the financial spend between the entities, the nature of the services between the entities (i.e a review that identifies any supply chain issues or matters that might increase the risk that services are provided via modern slavery), the entity's approach to modern slavery (inc their publication of a Modern Slavery Statement or similar) and their engagement with Hireup on discussion relating to managing modern slavery.
2. Take action to mitigate those risks:

- a. Annual Modern Slavery Risk Assessment: The key objective of the risk assessment is to identify supplies or vendors that pose a risk to Hireup's zero tolerance approach for modern slavery related risks. Should we identify a supplier that poses a higher than acceptable risk we would no longer engage the services of that supplier or vendor.
 - b. Hireup's Procurement Policy (Policy): The Policy continues to provide a comprehensive framework for sourcing strategies and purchasing processes. Our Policy ensures that all goods and services acquired by Hireup are valid, fit for purpose, cost effective, and that they reflect our commitment to operate in a socially and ethically responsible manner. The Policy also ensures adequate levels of due diligence are conducted on new and existing suppliers to allow us to identify and manage any Modern Slavery risks and to provide us with a better understanding of how our suppliers actively manage their own Modern Slavery risks. Hireup will continue this practice in 2024/25 for all new and existing suppliers. We will continue to monitor and re-evaluate suppliers compliance to Modern Slavery practices. We have reviewed Hireup's procurement processes and the associated policy and procedures. During this review there were no material changes made to any of the existing procurement related documentation or processes.
 - c. Training and Education: Training which covers an awareness of and the compliance requirements for Modern Slavery, is provided for employees involved in procurement activities. Hireup's Finance Team provides guidelines for the sourcing and procuring of goods and services and how our suppliers' Modern Slavery risks are identified and assessed. We continue to utilise the Modern Slavery Supplier Approval Form, which links to our Modern Slavery Supplier Code of Conduct (Code").
3. Track the entity's performance in mitigating the risks
- a. Reporting: The results of our annual review of suppliers and vendors is communicated to a number of key internal stakeholders.
 - i. The Finance team is apprised of any supplier of vendors that has not met our own internal criteria for engagement.
 - ii. Our Board and ELT are advised of the results of the risk assessment and any material changes in our suppliers relationships that arise from that risk assessment.
 - iii. Where internal processes are found to be ineffective in controlling the risk of modern slavery, we undertake a review of those controls and their effectiveness and develop plans to strengthen those controls or develop new controls.
 - b. Systems and Tools: Hireup's Enterprise Resource Planning tool enables us to manage Supplier Approval Forms electronically. Supplier responses to Modern Slavery questions are recorded against their supplier profile in our

ERP system. This enables Procurement to effectively monitor and report on supplier Modern Slavery answers and track supplier changes to these questions.

- c. New Ventures: In addition, as Hireup expands its Provider Venture we are applying additional controls to mitigate the possibility of Modern Slavery risks arising. This includes ensuring that all contracts between Hireup and a provider contain appropriate clauses relating to ethical workplace practices and modern slavery, monitoring of the work undertaken by Hireup's Support Workers when they are engaged with a provider, and ensuring all Support Workers engaged with a provider have clear and open feedback channel to raise issues or concerns.
- 4. Explaining publicly how those processes are operating
 - a. Hireup publishes our Modern Slavery Statement on our public facing website. This ensures that any external stakeholders is able to view our Statement
 - b. The Statement is communicated to staff internally after the review and the publication of the Statement. Internal staff training on procurement also refers to our approach to managing modern slavery and supply chain related risks.

Our governance structure and continuous improvement

We have continued to utilise Hireup's management and governance structures to support the ongoing development of our Modern Slavery Statement. The Enterprise Risk Team has responsibility for maintaining the overarching strategy, direction, management and coordination of our Modern Slavery projects and Modern Slavery Working Group.

The Risk & Safety Committee of the Hireup Board monitors and reviews key risk areas within the business and assists and advises the Board on decision making around Modern Slavery risks. The Committee also oversees Hireup's continuous improvement in responding to these risks.

Hireup's Finance team delivers our Procurement function, with emphasis on managing all supplier onboarding, modern slavery questionnaires, supplier spending, supplier payments, sourcing activities and supplier compliance with our Code. This is enabling Hireup to help drive and deliver better compliance across our supplier base.

Effectiveness

Building on Hireup's Fourth Statement where we identified and assessed risks associated with existing supply chains and operations, we have continued to monitor the

effectiveness of our actions to improve our response and strengthen Hireup against the risks of Modern Slavery.

Assessments to measure the effectiveness of these actions include:

- Continued monitoring of suppliers reviewed in previous years. This includes a current state assessment of their own positions on Modern Slavery including a review of their Modern Slavery Statements. Monitoring new suppliers who completed, signed and returned Hireup's Supplier Approval form.
- Monitoring of existing suppliers who completed, signed and returned Hireup's Supplier Approval form.
- Monitoring outcomes for actions taken on supplier risks.
- Monitoring any Modern Slavery complaints received and reported to the Risk and Safety Committee and the Board (which have been nil at the time of writing this Statement).

Emerging risks

In 2024 we continued to review existing and new suppliers, using our updated risk assessment processes (deepening our analysis of procurement spend per country), which have enabled us to capture, document and manage identified risks, possible risks and emerging risks.

This Statement was endorsed by Hireup Pty Ltd on 19 November 2024



Laura O'Reilly
Co-founder and CEO

This Statement was approved by the Board of Hireup Holdings Pty Ltd on 19 November 2024



Greg Couttas
Chair