

HAYS AUSTRALIA POLICY FOR THE PREVENTION OF & REPORTING ON MODERN SLAVERY

STATEMENT FOR 2020-2021 REPORTING YEAR

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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)' ('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.

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.

As at 30 June 2021, Hays Australia employed over 1,000 direct staff operating in 39 offices in each State and Territory of Australia. For the 2020-21 financial year Hays in Australia placed almost over 13,000 people into permanent jobs, and also filled over 65,000 temporary jobs, paying an average of 19,500 temporary workers each week. Hays Australia is also the registered branch of Hays' operations in New Zealand, consisting of six local offices.

We provide our recruitment and job agency/labour hire services in the following areas: Accountancy & Finance; Architecture; Banking; Construction; Contact Centres; Education; Energy; Engineering; Executive; Facilities Management; Healthcare; Human Resources; Insurance; Technology; Life Sciences; Logistics; Manufacturing & Operations; Marketing & Digital; Office Support; Oil & Gas; Policy & Strategy; Procurement; Property; Resources & Mining; Response Management; Retail; Sales and Trades & Labour.

Hays provides its services under various Hays' branded trading names including, Hays Accountancy & Finance, Hays Architecture, Hays Banking, Hays Construction, Hays Contact Centres, Hays Digital & Creative, Hays Education, Hays Energy, Hays Engineering, Hays Executive, Hays Facilities Management, Hays Healthcare, Hays Corporate Accounts, Hays Human Resources, Hays Technology, Hays Insurance, Hays Labour Hire, Hays Legal, Hays Logistics Personnel, Hays Manufacturing & Operations, Hays Office Support, Hays Oil & Gas, Hays Life Sciences, Hays Policy & Strategy, Hays Property, Hays Procurement, Hays Talent Solutions, Hays Resources & Mining, Hays Retail, Hays Sales & Marketing, Hays Trades & Labour, Hays Defence and Hays Assessment and Development.

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 health & 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 handed down in March 2019 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 and meat processing industry in certain states. It does not supply workers into the other high-risk sectors.

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 and 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 created a Supplier Code of Conduct 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 cleaning 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. Hays is also in the process of updating its RFI documentation 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 reviewed its standard form client contract to include specific references to modern slavery law compliance.

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

In the 2020-21 reporting year, Hays did complete the tasks that it set out to achieve. Our assessment of the effectiveness of those tasks is as follows.

Publish Hays' Supplier Code of Conduct

Hays created and published its Supplier Code of Conduct, a formal company document requiring Hays' 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 Hays' recruitment services suppliers (that is, second-tier suppliers who assist Hays in providing Hays' recruitment and managed services to Hays' clients) and to our office services suppliers (being those suppliers who provide services linked to our facilities management requirements). Hays will continue to do so.

Publish changes made to Hays' standard form contracts

Hays 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 Hays offices, engage with various suppliers of firstly, IT products and services, and secondly, office supplies, to the Hays office network to assess their modern slavery policies and processes.

Our Legal team partnered with our IT&T Director and Transactions & Facilities Manager to conduct an audit of selected existing suppliers. Suppliers were identified as being relevant to be subject to the audit based on the volume and value of services procured from them by Hays.

Suppliers were required to confirm their acceptance of and compliance with Hays' 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 Hays.

Update Hays' RFI process so that potential suppliers must formally disclose their modern slavery risk mitigation strategies

In a recently created role, our Vendor Partner, responsible for onboarding potential and actual suppliers introduced disclosure and compliance requirements into Hays' RFI process for suppliers' confirmation that they accepted and complied with Hays' Supplier Code of Conduct, our modern slavery requirements, and a request to furnish Hays with a copy of their modern slavery statement where relevant.

Increase the number of Hays employees who are provided with dedicated training on modern slavery laws

Informal training was delivered by our Legal team via discussion with heads of relevant business units within Hays covering both our sales and corporate services functions, and separately with the team responsible for updating our suite of standard form documents. We acknowledge that more

sophisticated training could be introduced in future, but we are satisfied that the internal conferences conducted with relevant business leads sufficiently brought these new laws, and the requirement to fully comply with them, to the attention of key stakeholders.

Set up an annual review process with members of senior management

An agenda item has been formally introduced in our Board meetings to review and approve our modern slavery statement for publishing.

Looking forward

Over the next reporting period, Hays will again continue to assess ways to reduce the risks of modern slavery.

Having completed our first year of reporting, 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 on taking the following steps over the next 12 months:

- Conducting another audit of current suppliers to assess their modern slavery policies and processes, with the focus being on suppliers of personal protective equipment to Hays
- Having read the items raised in ACSI's 'Modern Slavery Risks, Rights & Responsibilities' paper, considering whether it is appropriate to create a more sophisticated approach to auditing and responding to modern slavery risk, including:
 - Engaging with suppliers to establish where their services and products are procured
 - Considering whether Hays has applied its supply chain mapping beyond tier one suppliers
 - Considering whether it is appropriate for Hays to create a centralised approach to the collection of supply chain data
 - Identifying whether our suppliers or clients operate in high-risk geographies in relation to labour standards
 - Designing a response process following the identification or disclosure of modern slavery breaches

We will continue 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

This statement is made pursuant to the Act and constitutes Hays' slavery and human trafficking statement in respect of the 2020-21 reporting year and is approved by the principal governing body of Hays, being its board of directors.



Signed: Nick Deligiannis
Position: Managing Director, Australia and New Zealand
Hays Specialist Recruitment (Australia) Pty Limited