

# Modern slavery statement

ROBERT WALTERS

June 2024

## Introduction

This is our fourth Modern Slavery Statement (**Statement**) made pursuant to the *Modern Slavery Act 2018* (Cth) (the **Act**) and constitutes the modern slavery statement of Robert Walters Pty Ltd ACN 079 521 618 (**Robert Walters**). This Statement covers Robert Walters' operations during the calendar year of 2023 (**Reporting Period**).

## Reporting Entity Overview

Robert Walters is a specialist professional recruitment consultancy. We match highly skilled professionals to permanent, contract and temporary roles across the disciplines of accountancy and finance, banking, engineering, HR, IT, legal, sales, marketing, secretarial and support and supply chain, logistics and procurement.

Robert Walters was established in 1997 with its headquarters and registered office located at Level 23, Queen & Collins Tower, 376-390 Collins Street, Melbourne, Victoria, 3000.

As of 31 December 2023, Robert Walters had a total of 280 internal employees.

Robert Walters is a limited company incorporated in Australia. Robert Walters' parent company and ultimate holding company is Robert Walters plc, a public company limited by shares, incorporated and domiciled in the United Kingdom. Robert Walters controls two other entities: Robert Walters (Australia) Pty Ltd (**Robert Walters (Australia)**) and Resource Solutions Corporation Pty Ltd (**Resource Solutions**).

We have five offices across Australia: Melbourne, Sydney, Adelaide, Brisbane and Perth.

Our supply chains include suppliers from the following sectors: Accommodation, Cleaning, Logistics, Medical Information Technology, Office Supplies and Equipment, Security, Education, Utilities, Property Services, Food and Beverage, Events, Marketing, Travel, Print and Promotional Goods and Services. Most of our suppliers are located in Australia.

The operations and supply chains of Robert Walters' controlled entities are described below:

| Entity             | Operations   | Supply Chain   |
|--------------------|--|--|
| Resource Solutions | <p>Resource Solutions is a provider of Recruitment Process Outsourcing and Managed Service Provider solutions.</p> <p>As at 31 December 2023, Resource Solutions had a total of 10 internal employees.</p> | <p>Resource Solutions contracts with suppliers in the following industries:</p> <ul style="list-style-type: none"> <li>• Information Technology;</li> <li>• Food and Beverage;</li> <li>• Marketing and Advertising;</li> <li>• Communications;</li> </ul> |

|                            |   |   |
|----------------------------|---|---|
|                            |   | <ul style="list-style-type: none"> <li>• Labour hire, recruitment and executive search;</li> <li>• Property.</li> </ul> |
| Robert Walters (Australia) | Robert Walters (Australia) is a dormant entity controlled by Robert Walters. Robert Walters (Australia) is not carrying out any business activities in Australia. | No suppliers.   |

In preparation of this Modern Slavery Statement, we actively engaged and consulted with our reporting entity, Resource Solutions by referencing our obligations under the Act, providing them with details on our actions against modern slavery risks, and understanding their own actions against modern slavery risks.

#### Potential to cause (directly) – Recruitment and Labour Hire Services

We consider our business to have a low potential to cause modern slavery risks through its service offering. Robert Walters' core business is the supply of labour hire, payrolling and recruitment services in respect of white-collar roles in various industries.

Where labour hire and payrolling services are provided, Robert Walters employs or engages candidates directly who are then on-hired to our clients to perform temporary roles. We provide all candidates with an employment or engagement agreement (as applicable) written in English clearly setting out their terms of employment in accordance with local employment laws. We do not charge candidates fees for the employment or placement services we provide. Nor do we retain indefinitely the original sensitive and personal documents of candidates we employ, engage, or introduce to clients. We also conduct right to work checks where candidates are migrant workers holding temporary working rights in Australia to ensure the person is a lawful resident of Australia and has valid working rights. Our own recruitment consultants are trained to contact candidates regularly as a form of 'check-ins', as a basis for candidates to be open and communicate any concerns about their placements to our consultants, who are well-equipped to raise any matters to their managers.

Robert Walters is firmly committed to complying with all applicable laws in its provision of services and is governed by many industry specific authorities and bodies.

For example, each state, where applicable, is governed by labour licencing authorities to ensure labour hire companies are complying with their licencing requirements and laws. The objective of these labour hire licencing schemes are primarily to protect workers from exploitation by labour hire providers and their clients, to improve the transparency and integrity of the labour hire industry, and to promote responsible practices in the industry. These licencing requirements establish a framework for accountability within the labour hire industry and enable the licencing authorities to monitor and enforce

compliance, ensuring that providers meet their legal and ethical obligations towards workers. A requirement of these licences is that Robert Walters' officers and nominated officers on the licence pass the 'fit & proper person' tests and to also submit biannual reports to each licencing authority. These reports require us to declare, amongst other things, the number of candidates on our payroll, the class of visas held by any of these candidates, confirmation that we do not charge candidates for services, whether obligations under the National Employment Standards were adhered to, WHS incidents and details of any breaches of the *Fair Work Act 2009* (Cth).

In addition to the above, Robert Walters is a corporate member of the Recruitment, Consulting and Staffing Association (**RCSA**) As a corporate member of this industry association, we are bound by their Code of Conduct, which makes us accountable for meeting certain standards of professional conduct, including the requirements to protect candidates from exploitation (including forms of modern slavery); conduct business in a way that avoids causing or contributing to exploitation through their activities; and seek to prevent or mitigate risks of exploitation that are linked to their operations or services by their business relationships, even if they have not contributed to those risks. RCSA corporate members are responsible for ensuring that their own staff meet the standard of professional conduct required by its Association's Code of Conduct.

#### Potential to contribute (indirectly)

We understand that recruitment agencies in general may potentially contribute to modern slavery practices by supplying and introducing candidates to companies operating in high-risk sectors or countries.

The *Modern Slavery Risks, Rights & Responsibilities* report,<sup>1</sup> commissioned by the Australian Council of Superannuation Investors and prepared by KPMG, identified six high-risk sectors: financial services, property, food and beverage, agriculture, mining, and health care. State labour hire licensing schemes also consider the following industries to represent a higher risk: trolley work, horticulture, meat processing and seafood processing, fishing, and cleaning.

Of the high-risk sectors identified, those which Robert Walters provides services to are the financial services, property, and health care industries in Australia. In all cases, Robert Walters only supplies services in respect of white collar professional roles.

To mitigate any risks of underpayment to, or exploitation of, our labour hire workforce, we provide extensive training to our recruitment consultants on workplace laws and regulations. We are proud to announce that we have achieved our objective in rolling out mandatory modern slavery training for all Robert Walters staff during the reporting period. The training was released via our new learning management system and will be discussed further below.

In addition, our internal finance and payroll systems are designed in a way that prevent the recording of candidate placements with a pay rate that is below the applicable minimum wage rate or the rate

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<sup>1</sup> KPMG, *Modern Slavery Risks, Rights & Responsibilities* (Report, February 2019) <<https://assets.kpmg/content/dam/kpmg/au/pdf/2019/modern-slavery-guide-for-companies-investors-feb-2019.pdf>>.

prescribed by the relevant modern award. These measures allow Robert Walters to educate and alert its clients about potential underpayments of candidates they are looking to engage for temporary roles.

Robert Walters is also fully certified to ISO 9001:2015 - Quality, ensuring the highest possible levels of service quality. Implementation of an ISO management system (internationally recognised framework) has meant that Robert Walters has had to consider its working environment, and the needs and expectations of workers, including the risk of forced labour being an issue to consider. An ISO management system prompts an organisation to ensure proper controls and procedures are in place to manage risks including modern slavery risk. Robert Walters is also certified to ISO 45001:2018 – Safety and by holding this accreditation, Robert Walters takes on the responsibility for how our systems affect all workers which means there are clear reputational and regulatory risks to manage if modern slavery is found or associated with our organisation, which in turn ensures Robert Walters conducts due diligence on its supply chains to ensure modern slavery risks are addressed adequately.

#### Be linked to (via supply chains)

We understand that by virtue of procuring goods or services from third parties, we may be unintentionally linked to modern slavery. As such, we are committed to engaging with trusted suppliers.

Our supply chain includes suppliers from the following sectors: Accommodation, Cleaning, Logistics, Medical Information Technology, Office Supplies and Equipment, Security, Education, Utilities, Property Services, Food and Beverage, Events, Marketing, Travel, Print and Promotional Goods and Services. The majority of our first-tier suppliers are based in Australia. We also have global agreements with large suppliers in the UK, USA and Singapore which are all closely monitored.

### Actions Taken by Robert Walters

Since publishing our first Modern Slavery Statement, we have strengthened our key policies and procedures and have implemented additional measures to assess and address modern slavery risks in our operations and supply chain.

#### Modern Slavery Policy

In October 2020, we published a Modern Slavery Policy on our website. It requires all our Suppliers to comply with our policy when supplying goods and services to us. Robert Walters has a zero-tolerance approach to any imposition of, or connection with, modern slavery and human trafficking. The policy reflects our commitment to acting ethically and with integrity in respect of our staff, business relationships and the community in general. Supplier engagement is also emphasised in the policy by way of promoting ethical practices and mitigating modern slavery risks.

During the reporting period, we reviewed our Modern Slavery Policy and implemented a Modern Slavery Formal Response Mechanism, this is detailed further below.

The policy can be found on our website or via the following link:

<https://www.robertwalters.com.au/about-us/modern-slavery-statement-policy.html>

## Whistleblowing

In early 2024, Robert Waters Group rolled out a global Whistleblower Policy to cover each region with country-specific provisions for Australia as applicable. This Policy was almost a year in the making to ensure each region had their input. The aim of the policy is to offer a straightforward method for third parties to raise serious genuine concerns about any wrongdoing connected with Robert Walters. The Whistleblower Policy allows eligible disclosers to report on a matter where there are reasonable grounds to suspect misconduct or an improper state of affairs in relation to Robert Walters, its employees, officers or any related body corporate. Disclosures may relate to violations of modern slavery laws. Eligible disclosers can make a disclosure in person, by phone or post, or anonymously. Simultaneously, Robert Walters Group rolled out its global 'Raising a Serious Concern at Work' (internal whistleblowing policy) in early 2024, aimed at providing a straightforward method for employees to raise serious and genuine concerns aimed at preventing malpractice within or affecting the organisation. The Whistleblower Policy can be found via the following link:

<https://www.robertwaltersgroup.com/content/dam/robert-walters/group/sustainability/files/policies/Robert%20Walters%20Group%20Whistleblowing%20Policy.pdf>

## Code of Conduct

The Robert Walters Code of Conduct was reviewed in early 2023 with the view to making its application global and replacing local Code of Conduct policies. The Code of Conduct was released in September 2023 globally, with trainings provided by local HR to explain the updates to employees. The Code of Conduct emphasises to employees that they must focus on candidate care and provides examples on how to deal with candidate privacy, raising concerns with Managers regarding human rights/ethical trading and encouraging employees to speak up if a candidate appears to be upset or vulnerable. The Code of Conduct can be found via the following link:

[https://www.robertwaltersgroup.com/content/dam/robert-walters/group/sustainability/files/policies/RWG\\_Our%20Code%20of%20Conduct\(Oct2023\).pdf](https://www.robertwaltersgroup.com/content/dam/robert-walters/group/sustainability/files/policies/RWG_Our%20Code%20of%20Conduct(Oct2023).pdf)

## Supplier Code of Conduct

Our Supplier Code of Conduct was published in January 2021 and sets a minimum standard for all our Suppliers. Our expectation is that our suppliers implement adequate measures to comply with legal, ethical, social and environmental requirements and best practices in Australia and internationally, where applicable. Our Supplier Code of Conduct can be found via the following link:

<https://www.robertwalters.com.au/about-us/supplier-code-of-conduct.html>

## Ethical Conduct Policy

We also have a global Ethical Conduct Policy to assist in managing the risks associated with modern slavery. This policy serves as a guide for all our employees to understand Robert Walters' expectation in

relation to ethical behaviour and establishes a foundation for professional and responsible practices from within.

<https://www.robertwaltersgroup.com/about-us/policies.html>

### Social Accountability and Human Rights Policy Statement

Our global Social Accountability and Human Rights Policy Statement outlines our commitment to social responsibility and affirms our commitment to uphold human rights of all individuals. The policy emphasises the promotion of fair and ethical employment practices including prohibition of forced labour.

<https://www.robertwaltersgroup.com/about-us/policies.html>

### Contractual Obligations

Robert Walters still continues to insert its modern slavery clause into supplier contracts which requires our suppliers to take steps to mitigate modern slavery risks within their supply chains and notify us where a modern slavery risk is identified within their supply chain. The clause also requires suppliers to represent and warrant that they are not aware of any modern slavery in their own operations, subcontractors, or suppliers' operations. We believe this contractual obligation is essential to mitigate risk in not only our Tier 1 Suppliers, but through to our Tier 2 Suppliers and beyond. Robert Walters is considering whether to revise the clause and make it a requirement for the supplier to provide requested supply chain information where failure to provide such information, may result in termination of the contract. We are considering whether this requirement is best placed in a clause or elsewhere.

### Client due diligence

Robert Walters is familiar with participating in clients' own due diligence processes as part their respective supply chain (as a supplier of recruitment services). Our clients range from small businesses to global corporations. We also collaborate with varying government departments across Australia. Through this, Robert Walters has the ability to gain insight into its own client's practices in terms of actions taken against modern slavery by them.

### Modern Slavery Mandatory Training

As indicated above, we rolled out our mandatory modern slavery training via our new learning management system as part of our short-term goal to combat modern slavery during the reporting period. This training is mandatory for every employee and focuses on the prevention of modern slavery and educating participants on the forms of modern slavery that exist and ways we can take action against them. The course also encourages employees to ask questions of suppliers and third-party agencies to help identify risks. This training is especially important for our back-end operations such as our office managers and marketing departments, who interact with potential suppliers.

The goal of our modern slavery course is to equip our staff with the knowledge and skills necessary to take their own individual actions against the risk of modern slavery by increasing their accountability. It is a company effort to tackle modern slavery. All employees are required to do an annual refresher of this training to ensure their knowledge and skills are maintained.

### Anti-Bribery Mandatory Training

During the reporting period, Robert Walters also rolled out mandatory Anti-Bribery Training for all employees to complete given that bribery and slavery can stem from similar root causes. This comprehensive training promotes accountability and respect for human rights across business operations. The training also addresses the consequences of corruption and includes a quiz to assess employee's understanding upon completion.

### Modern Slavery Formal Response Mechanism

Robert Walters is proud to share that it has achieved its goal in creating a formal response mechanism comprising the Modern Slavery Response Plan and Modern Slavery Incident Response Form. This initiative encourages individuals to report suspected modern slavery to Robert Walters by completing the Modern Slavery Incident Response Form and sending the report to Robert Walter's legal team to assess, escalate and implement remedial action accordingly in accordance with our Modern Slavery Response Plan. Our formal response mechanism can be located in our modern slavery policy which is open to the public as well.

<https://www.robertwalters.com.au/about-us/legal/our-policies/modern-slavery-policy.html>

### Modern Slavery Questionnaire

Robert Walters continues to send out our Modern Slavery Questionnaire on an annual basis to all suppliers, which is issued to all of our Tier 1 Suppliers. We have internal systems which keep track of our suppliers and internal transactions. This list was then expanded to include contact details and important information about each of our Suppliers so that we could easily issue our questionnaire to the relevant contacts at each Supplier.

The aim of the questionnaire is to gather information on how our suppliers are managing modern slavery risks within their own supply chains, to ensure they are taking appropriate measures and to potentially identify Tier 2 suppliers.

### Self-Assessment Questionnaire

We also have an onboarding questionnaire which is sent to new suppliers requiring them to provide information related to their operations and supply chains. New supplier responses are conditional on Robert Walters accepting them as suppliers.

### Internal Audits

Robert Walters maintains high principles in respect of human rights in its internal and external operations. Each year Robert Walters' internal HR and Payroll teams conduct salary and wage audits to ensure that each employee receives at least the minimum wage, applicable penalty rates and superannuation as required by law.

Robert Walters' internal systems (including our payroll systems) are designed to prevent underpayment of its candidates and permanent staff.

## Candidate Care

Robert Walters' recruitment consultants are committed to maintaining exceptional candidate care. We maintain close contact with all candidates upon placement in temporary and permanent roles and have regular catch ups with such candidates to identify any unfair or unjust treatment of candidates by clients. Some of our offices also have a dedicated candidate management team to ensure regular contact with candidates, even those in long tenure roles.

Our consultants and candidate management team receive extensive training on the type of questions to ask a candidate about their new role, volume of work, working hours and how the job meets the candidate's expectations to easily identify signs of poor health, work conditions or mistreatment.

Assessing the Effectiveness of our Actions

## Number of complaints

Robert Walters provides avenues for candidates and permanent staff to raise concerns about payments and working conditions. During the Reporting Period, Robert Walters did not receive any complaints from candidates or staff in relation to matters that could result in or contribute to the risks of modern slavery.

## Regular reviews of internal processes

Our business departments are constantly considering how they can improve Robert Walters' operations. We conduct regular reviews of our internal processes, databases and our policies that we share with staff and external stakeholders.

## Internal audits and reviews

Our internal Payroll team conducts monthly reviews of processed payments to identify if candidates who are paid a fixed hourly rate are better off overall when compared to being paid in accordance with a modern award. During the Reporting Period, Robert Walters' Payroll Manager identified two instances where an on-hired candidate was underpaid because each candidate worked unscheduled overtime hours over a one-month period. In both instances, the candidate was back paid the correct amount as soon as the underpayment was identified and their salary was amended to meet the applicable award rates.

## Modern Slavery Questionnaire Responses

Our modern slavery responses are an easy way to identify any risks within our supply chain and identify which are high risk suppliers. The responses to the questionnaire have not presented any obvious risks or issues within our supply chain. These questionnaires will be sent out on an annual basis and the Self-Assessment Questionnaire will be sent to new suppliers.

## Our Goals

Robert Walters will continue focusing on improving its anti-modern slavery practices. Our goal for 2024 is to require first-tier suppliers to report on their suppliers and operations within their supply chains.

Robert Walters will need to consider the best way to do this for example, imposing transparency requirements via supplier contracts or imposing further questions in our Modern Slavery



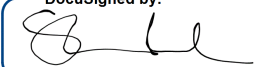
Questionnaires/Self-Assessment Questionnaires. Based on the information provided by our suppliers, we intend on mapping the supply chain to enable Robert Walters in identifying and addressing modern slavery risks through its supply chains.

Robert Walters has established certain risk management goals it plans to achieve in the future. We have divided risk management goals into two categories: short-term goals and long-term goals.

Short-term goals are actions Robert Walters aims to undertake in the next reporting period using its best endeavours. Long term goals describe actions Robert Walters intends to undertake within the next five (5) years to manage and mitigate risks of modern slavery.

| Short term goals  | Long term goals   |
|---|---|
| <p><b><i>Second-tier supplier assessment</i></b></p> <p>Robert Walters will require its first-tier suppliers to report on their suppliers and operations within suppliers' supply chains.</p> | <p><b><i>Audit of business enablement services</i></b></p> <p>Robert Walters will conduct audits on business enablement services that are supported by employees operating outside of Australia via related entity.</p>   |
| <p><b><i>Supplier mapping</i></b></p> <p>Robert Walters aims to prepare a map of its supply chain which extend to second and third tier suppliers.</p>  | <p><b><i>Establish a Modern Slavery Audit &amp; Risk Committee</i></b></p> <p>Robert Walters will put together a Modern Slavery Audit &amp; Risk Committee to ensure modern slavery actions are continually improved and clear metrics are put in place to measure the impact of anti-modern slavery actions.</p> |

This statement was approved by the board of Robert Walters Pty Ltd on 21 February 2024.

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 Shay Peters  
 CEO - ANZ  
 Robert Walters Pty Ltd