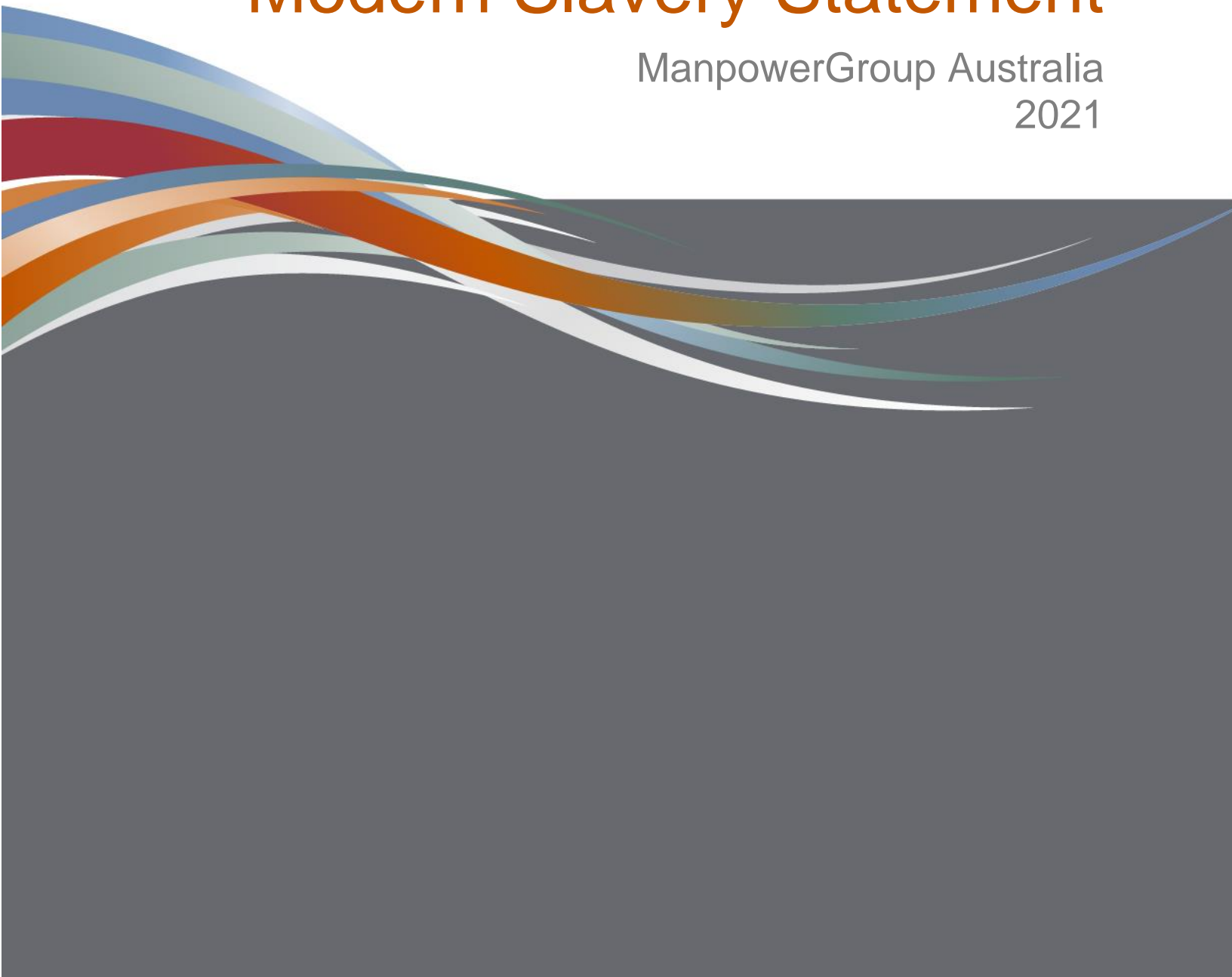




ManpowerGroup®

# Modern Slavery Statement

ManpowerGroup Australia  
2021



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## 1. Reporting Entities

This Modern Slavery Statement is made on behalf of ManpowerGroup Australia for our second reporting period to 31 December 2021. It is a joint statement covering the following entities that together are known as ManpowerGroup Australia:

**Manpower Services (Australia) Pty Ltd ABN 15 071 884 994 (henceforth Manpower)**

**Experis Australia Pty Ltd ABN 57 071 352 031 (henceforth Experis)**

**Right Management Consultants Pty Ltd ABN 82 006 132 163 (henceforth Right Management)**

Manpower Services and Right Management are both wholly owned subsidiaries of ManpowerGroup Inc, our parent company based in Milwaukee, Wisconsin, US. Experis Australia Pty Ltd is owned and controlled by Manpower Services.

Manpower Services is a reporting entity under the Modern Slavery Act. Experis Australia and Right Management are reporting on a voluntary basis. Each entity is covered by ManpowerGroup Australia's centralised governance and management systems.

Number of employees at 31 December 2021: Manpower – 567, Experis – 52, Right Management – 94.

Number of on-hired workers engaged during 2021 is approximately 5645.

## Statement from Penny O'Reilly, Managing Director Manpower and Experis, and Tim Roche, Country Manager Right Management

ManpowerGroup has a deep heritage of operating at the highest level of integrity. Conducting business in an ethical and responsible manner is a key reason why we were named to the Ethisphere Institute's list of the World's Most Ethical Companies for the last 13 consecutive years and also named one of Fortune Magazine's most admired companies. Our corporate governance practices are intended to ensure principled goal setting, effective decision-making, management accountability, and appropriate monitoring of compliance and performance.

For more than 70 years we have operated on the belief that meaningful, sustainable employment has the power to change the world. We have a zero-tolerance policy on forced labour, child labour, human trafficking and abusive treatment of workers. We will not knowingly do business with any company that benefits in any way from the trafficking or abusive treatment of workers or any form of slavery.

As trusted and responsible industry leaders, we know that unethical and exploitative operators act illegally under the guise of our industry to facilitate human trafficking and modern slavery, enabling illegitimate and invisible workforces. These practices are abhorrent to us and directly opposed to everything we stand for. ManpowerGroup continues to voice our concerns and support the call for action against human rights abuses in the world of work as we have over many years.

ManpowerGroup does not engage in or support any deceptive, coercive or otherwise exploitative practices in our operations. We strive to promote our values and expectations of the same to our business partners and have taken the opportunity to review our human rights approach in line with the Modern Slavery Act.

During 2021 we remained committed to playing our part, informed by our modern slavery risk profile, to help address and prevent human rights abuses in the world of work. This second Statement explains the actions we took to assess and address the problem of modern slavery against the reporting criteria in 2021, and our plans for continuous improvement in future years. Our work continues.



**Penny O'Reilly**, Managing Director  
Manpower & Experis



**Tim Roche**,  
Country Manager, Right Management

## Vision & Values

Our Vision is to lead in the creation and delivery of innovation workforce solutions and services that enable our clients to win in the changing world of work. Our Vision is underpinned by our Values of People, Knowledge and Innovation.

## Code of Business Conduct and Ethics

The purpose of our Code of Business Conduct and Ethics is to provide guidance to all of our colleagues and partners on the conduct of our business according to the highest ethical standards. Our Company's brand and reputation is best known for its trustworthiness – an attribute that we intend to uphold in all that we do. ManpowerGroup has grown and prospered with a culture of honesty, integrity and accountability and we believe that this culture remains as our strong competitive advantage.

To review the Code, please visit [www.manpowergroup.com.au/ethics](http://www.manpowergroup.com.au/ethics)

All employees worldwide must complete annual training related to the Code of Business Conduct and Ethics and Company policies for Anti-bribery, Anti-corruption and Data Privacy.

## ManpowerGroup Business Ethics Hotline

Our Code of Business Conduct and Ethics promotes honest and ethical conduct throughout the organisation, as well as provides a mechanism to report unethical conduct via the ManpowerGroup Ethics Hotline to help preserve the culture of honesty and accountability throughout the Company.

ManpowerGroup's Ethics Hotline is a 24-hour secure hotline available to employees and the general public to report suspected, planned or actual violations of the ManpowerGroup Code of Business Conduct and Ethics, the law or any other workplace misconduct.

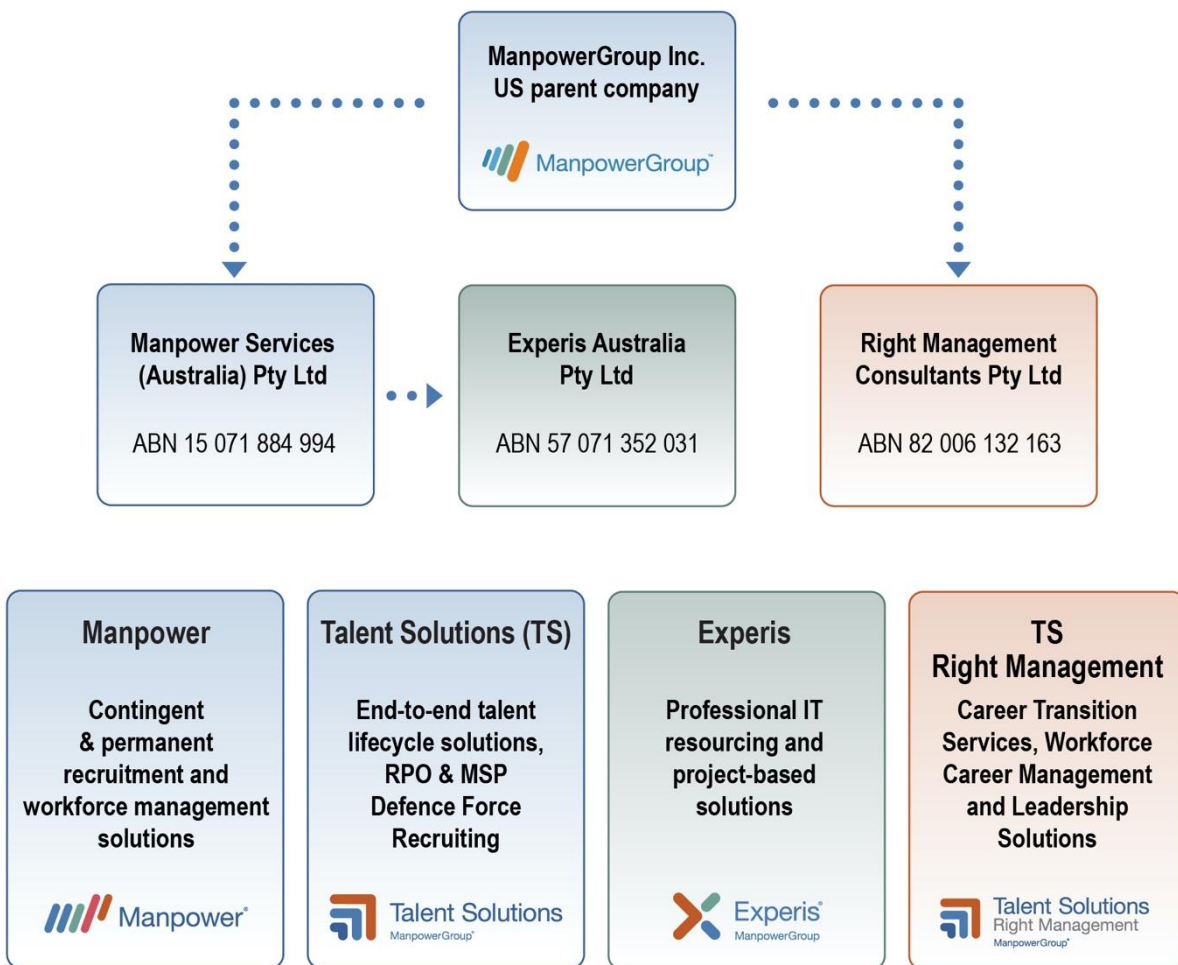
This global mechanism available in a range of languages and provides a wide range of country access codes to ensure access is readily available to anyone worldwide who has a concern to report, including our business partners, suppliers and their workers.

**To submit a complaint in Australia call 1800 457 897 or visit**

**[www.manpowergroup.com/ethics/business-ethics-hotline](http://www.manpowergroup.com/ethics/business-ethics-hotline)**

## 2. Structure, Operations and Supply Chain

ManpowerGroup® (NYSE: MAN), the leading global workforce solutions company, helps organisations transform in a fast-changing world of work by sourcing, assessing, developing and managing the talent that enables them to win. We develop innovative solutions for hundreds of thousands of organisations every year, providing them with skilled talent while finding meaningful, sustainable employment for millions of people across a wide range of industries and skills. Our expert family of brands – Manpower®, Experis®, and Talent Solutions – creates substantially more value for candidates and clients across 75 countries and territories and has done so for over 70 years.



## 2.1 Brand Operations



Our corporate and head office business functions sit under the ManpowerGroup brand. Dedicated teams provide support for our operational brands Manpower, Experis and Talent Solutions in the areas of Sales, Marketing, Finance, Shared Services, Legal, People & Culture, Information Systems and Operations. These functions are key enablers to our success as an organisation because their activities are aligned to support the efficient and effective delivery of our solutions, and our ethical business framework.



Contingent and permanent recruitment and workforce management solutions. Manpower provides organisations of all sizes with total talent management staffing solutions to enhance business agility and competitiveness. Operating Australia wide, Manpower helps our customers secure the right talent today, so they can win in the ever-changing world of work tomorrow.

No matter what form these solutions take – short-term assignments, permanent placement or value add solutions – we provide rapid access to highly qualified talent and a better approach to matching the right associate with the right position resulting in better business results. Manpower leverages market experience, specialist focus and targeted sourcing methods to enable the development of quality talent pools across a broad range of role types in the following niches: Accounting & Finance, Corporate Services, Industrial & Technical, Sales & Marketing and Health, Safety & Environment.



Professional resourcing and project-based solutions. Leaders in sourcing in-demand professional talent for the ever-evolving technological world. Specialist Technology and IT recruitment.

At Experis, we help businesses overcome challenges, accelerate key initiatives and seize big opportunities by finding the best people in information technology that will lead them to success. Simultaneously, we open the doors for IT professionals who are looking to find an exciting new career opportunity where they can thrive and reach their full potential. We connect people and businesses alike in the ever-evolving world of IT.

## Manpower and Experis – Recruitment Operations

Manpower and Experis service two of key customer groups, known as clients and candidates. Clients are companies, businesses or organisations seeking workers. Candidates are individuals seeking work. As recruiters we facilitate the connection between clients and candidates through fulfillment of job orders. Our core business is to provide recruitment and staffing services to our customers, enhanced by our deep expertise and insights into the world of work.

Temporary or contingent recruitment refers to a candidate being offered employment with us, for placement into a work opportunity with our client. The placed candidate is technically known as an on-hired worker, meaning an individual engaged by Manpower or Experis whose services are on-hired to one of Manpower or Experis' clients. On-hired work is also commonly referred to as labour hire, staffing or agency work.

Permanent recruitment is where we have been engaged by our client to coordinate a recruitment campaign on their behalf to identify and place a candidate into a permanent role as the client's employee.

**In all cases we ensure that the individual seeking work is fully informed about the nature of the employment circumstances and work opportunity being made available to them during the recruitment process. Furthermore, we will only offer work opportunities after they have first been qualified as genuine, decent and safe in line with our values.**

For recruitment and staffing services performed by ManpowerGroup, customer satisfaction for both clients and candidates is the vital link to our success and cannot be compromised. An ethical and responsible recruitment framework is inherent within our business model and operations. All clients and candidates are given a clear and transparent understanding of the way in which we operate and what to expect when we deliver our services to them. Our recruitment consultants, administrators and managers are trained to operate within our ethical business framework and our corporate business functions provide the support they need to meet legal, regulatory and company obligations and standards.

From a commercial perspective, these minimum standards apply in our recruitment operations, and are fundamental to our business model:

We charge our clients fees for the service we provide in filling their 'job orders', and we require our clients to sign our terms of business or an equivalent contract beforehand. Our invoice is issued to the client organisation upon satisfactory fulfillment of their job orders or delivery of their workforce solution. We do not charge fees to individuals seeking work at any stage of the recruitment process. All candidates, including applicants, and workers of any type that interact with us are:

- **Never charged fees under any circumstances or at any time before, during or after their contact with us**
- **Never coerced or deceived about the true nature of the work opportunity we may be able to offer them**
- **Always free to accept, decline or discontinue any work opportunity of their own free will**

Furthermore, all individual temporary, casual or permanent employees are provided with an agreement to read, understand and sign that sets out their specific work and compensation arrangements, including their rights, responsibilities and protections. ManpowerGroup is proud to set a high industry standard of compliance and risk management for our customers, in line with our values.





End-to-end talent lifecycle solutions. Helping align business growth with workforce solutions strategies to transform the way organisations source, manage and develop the right talent today, and for the future. Combining more than 40 years of expertise, we offer end to end talent lifecycle solutions by leveraging our consulting and analytics capabilities to help organisations more effectively source, manage and develop talent at scale.

Talent Solutions brings together our **MSP, RPO and Right Management** offerings to deliver technology-enabled, innovative workforce solutions to our clients. Our integrated solutions provide end-to-end, data-driven solutions for talent attraction, acquisition, development and upskilling, and retention at scale.

## MSP and RPO Operations

**Recruitment Process Outsourcing (RPO)** Tailored solutions for permanent and contingent talent with a holistic approach to transforming how organisations source, manage and develop their workforce. The global leader in outsourcing services for large-scale recruiting and workforce-intense initiatives.

**Managed Service Provider (MSP)** Comprehensive global solutions that optimise contingent workforce management and drive performance through people, process and technology. Developing, deploying and enabling an integrated approach to managing contingent talent across Australia.

Where we develop MSP or RPO workforce solutions for clients through our Talent Solutions brand, we may assist our clients to manage other recruitment and staffing providers implemented as part of the solution. In our MSP agreements, the promise is generally to manage the client's overall contingent workforce program as defined in the client Statement of Work (SOW). The SOW will generally include specific language:

- To provide integrated resource fulfillment services to assist clients in the management and automation of their contingent and permanent workforce requirements.
- To provide vendor management and related services to assist clients in the automation of their staffing management processes.

In our RPO agreements, we generally have multiple performance obligations, which relate to managing all or part of the client's permanent workforce recruitment program, for example the RPO we deliver for the Australian Defence Force through our public-private collaboration called Defence Force Recruiting.

**Again, these solutions are always delivered at the organisational level and apply the same standards whereby all fees charged are borne solely by clients, and never by candidates or workers. Transparency of work arrangements and recruitment process for individuals and candidates is fundamental and clear details are always provided.**

When working with other recruitment and staffing providers we are conscious of maintaining high standards of compliance and oversight for our customers to ensure these business partners meet the same ethical and responsible recruitment standards we set for ourselves. We expect that all our business partners will adhere to business principles, culture and values that are consistent and transparent with our own standards of social responsibility and sustainability. Where necessary we conduct due diligence, checks and reviews order to confirm that our expectations are being met, and where any improvements may be needed.



Enabling organisations to attract, develop and retain the top talent crucial for success in a rapidly transforming business environment. Outplacement, career management and leader development to accelerate organisational performance and build future ready talent.

Right Management offers our clients expertise, insights and solutions to help them manage their talent lifecycle, strategic workforce needs and organisational culture. Our three areas of operational expertise are Career Transition Services, Workforce Career Management, and Leadership Solutions.

## Right Management – Operations

**Career Transition Services** Our outplacement and career transition services have helped more than 3.5 million people transition to new careers and opportunities. Our clients, organisations of all types and sizes, engage us to develop and deliver programs that:

- Support their employees with effective outplacements services for departing individuals
- Minimise the disruption of workforce transitions while also supporting remaining employees with career development support in the form of coaching and upskilling provided by dedicated coaches
- Maintain employer brand and ensure business continuity by proactively engaging and retaining critical talent

**Workforce Career Management** With global skills shortages at an all-time high, a workforce career management strategy is key to organisational success. We help businesses create agility within their workforces through flexible programs for managers and individuals. Our clients engage us to:

- Provide organisational consulting services and insights into changing roles and the talent pipelines to fulfill them, and the change management expertise to support the adoption of new workforce strategies
- Assist organisations to provide career development and opportunities internally, to engage, retain and reskill their talent
- Develop and deliver manager and career coaching programs and tailored leadership solutions

**Leadership Solutions** Based on extensive research, our leadership solutions are powered by our leader effectiveness model, to help our clients invest in the right people. We use globally validated assessments and expert coaching to help identify and develop your leaders of today – and tomorrow.

- Leader assessment and selection, onboarding, development and coaching
- Team effectiveness, change management

Right Management's operational expertise is underpinned by Talent Solutions' market leading Workforce Analytics and Data-Driven Capabilities. From a commercial perspective, our solutions and services are primarily delivered to organisations who are charged fees for the services we provide to them and their people. An individual career guidance program is available as an additional offering for individuals seeking to invest in their own personal development and this program operates independently from any recruitment services offered by ManpowerGroup.

## 2.2 Supply Chain

ManpowerGroup conducts its operations from leased office premises in a range of capital city and regional centres around Australia. However the ongoing pandemic saw a significant component of our internal workforce continue working from home during 2021.

Physical infrastructure needed includes office furniture, reception, kitchen and bathroom facilities, video conferencing and presentation aids, IT infrastructure ranging from telephone systems to server rooms, printers and copiers, laptops and mobile devices for staff, electronic access and security systems, software systems and technologies, car parking, heating and cooling equipment, energy and water utilities. Facilities management services such as cleaning, repairs and maintenance allow us to provide safe and healthy workplaces. A variety of consumables ranging from milk and filtered water to stationery supplies and business cards are purchased, along with courier, postal and storage services.

Some of our operational teams reach their target market through a series of events and presentations hosted in venues around metropolitan and regional Australia, requiring the purchase of signage, merchandise, venue hire, plant and equipment hire, catering, conference and stallholder fees. Event management services, activity providers, speakers and associated support services are utilised. Travel methods for staff to reach their destinations are primarily by air and road including car hire and other passenger transport services, and hotel accommodation is provided for staff required to be away from home.

Services to support our operations include a range of internet based applications, platforms and online systems, including website design and delivery, advertising services, social media and communications tools, HR, financial, accounting and banking systems, sales and recruitment databases, applicant capture, tracking and associated management systems, candidate assessment, training and background

checking software, electronic form delivery and reporting tools.

Various licences, regulations, memberships and insurances are purchased, as is external advice for legal, workers compensation, safety, audit and assurance, specialist project consultants, public relations and incidental professional services. Staff amenities include benefits and recognition programs, health and wellbeing services, gifts and flowers to mark key occasions, awards and contributions.

ManpowerGroup uses suppliers drawn from a wide range of industry sectors, including many single sector suppliers. This did not change significantly in 2021. Over ninety percent of our tier one suppliers are Australian companies.

In 2021 ManpowerGroup moved away from a formal procurement function for larger purchases and embedded a decentralised buying process for all purchases. This is governed by our rigorous contract review and risk assessment policy. Ongoing suppliers are managed by contracts and an internal contact is designated to oversee each of these relationships. A range of individual role holders are authorised to make ad hoc purchases on behalf of the company within a defined scope and value as applicable to their role, and in line with company policies.

A significant segment of our supplier management activities is for a variety of recruitment and staffing service providers from within our own industry. Carefully selected by our clients, they deliver workforce related services as part of an overall MSP or RPO solution managed by ManpowerGroup under the Talent Solutions brand. Ultimately these providers are owned by our clients and co-managed by us. Working with reputable business partners from within our own industry sector is an integral part of our business model. From time to time, we also utilise the services of specialist recruitment agencies when searching for talent to staff our business.

## 2.3 COVID-19 Response

In response to the ongoing COVID-19 pandemic, the health, wellbeing and safety of our people remained our utmost priority. Actions to keep our people safe during this time included:

- *Putting in place the technology, tools and security that allowed staff to work remotely wherever possible*
- *Monitoring the COVID-19 situation and maintaining safe environments in line with government requirements*
- *Complying with and implementing any federal, state or territory legislation which requires staff to be vaccinated against COVID-19.*

The preparation of this statement was affected in the following ways:

- *Availability of internal resources due to business continuity priorities*
- *Rescheduling of tasks not directly aligned with core business viability*

We supported our clients with solutions they needed, proactively partnering with them to ensure the safety and well-being of our on-hired workforce, including:

- *Host clients required to provide assurance of a COVID safe workplace including for on-hired workers*
- *Completion of COVID-19 Health Screening form prior to approval to return to the workplace or commence at a new workplace*
- *Application of the relevant award guidelines for leave and pay arrangements for our on-hired workforce*
- *Supporting and implementing all client policies which require workers to be vaccinated against COVID-19, provided that the client policy is lawful, fair and reasonable.*

For those finding themselves out of work due to the pandemic, our e-learning resources were made available for them to build new skills and support them to transition and upskill for future positions.

With regard to our suppliers, we did not seek to vary or cancel contracts or impose new conditions on our suppliers due to the pandemic.

## 3.1 Risks of Modern Slavery – Operations

### Operations Analysis – Manpower, Experis, Talent Solutions (RPO and MSP)

ManpowerGroup holds Labour Hire Licences and Employment Agent Licences in all states and territories that require them including Victoria, Queensland, South Australia, Western Australia and the Australian Capital Territory. As a licenced labour hire agency we meet our obligations for regular reporting to the regulators.

ManpowerGroup has maintained Staffsure certification since 2017. The Staffsure Standard and certification program was developed by the Recruitment and Consulting Services Association (RCSA) in consultation with industry, government and unions. StaffSure allows Workforce Service Providers to prove and market their business integrity and by doing so, protect the broader integrity of the recruitment and staffing industry throughout Australia.

Unfortunately, unethical and exploitative operators exist who in no way reflect the values and practices of the legitimate employment placement industry sector. These ‘sham’ operators are of great concern to organisations like ManpowerGroup that are committed to

operating legally and in the best interests of our clients, candidates and on-hired workforce.

Cases of labour exploitation in Australia have been identified in industries with a high percentage of migrant workers holding temporary work visas such as working holiday makers, international students, skilled temporary workers, seasonal workers as well as illegal workers. Within Australia industries considered to be at risk of forced labour exploitation include agriculture, construction, domestic work, meat processing, cleaning, hospitality and food services.

Although ManpowerGroup does not actively seek clients from these sectors, in 2021 Manpower did provide services to clients from all but one of these sectors (domestic work). Job seekers holding temporary work visas, working holiday makers and international students are welcomed across all our brands provided we can offer them roles within the limitations of their visa conditions. ManpowerGroup is not involved in the Australian Government’s Seasonal Worker Programme.

### Exploitation Risks in the Employment Placement Sector and Controls in Place at ManpowerGroup

Type of Risk	Relevant Brand	Description and Controls
Child labour  Likelihood – occasional	Manpower	<ul style="list-style-type: none"> <li>• Work eligibility policy and procedures.</li> <li>• If a work rights check confirms that the candidate is aged less than 18 years, ManpowerGroup’s legal team is contacted to determine whether the employment of the candidate will comply with applicable laws before the candidate can be placed in an assignment or put forward for a permanent position.</li> </ul>

Type of Risk	Relevant Brand	Description and Controls
<p>Poor / unsafe working conditions</p> <p>Likelihood – possible</p>	<p>Manpower Experis Talent Solutions</p>	<ul style="list-style-type: none"> <li>• Health &amp; Safety policy and procedures.</li> <li>• Workers are provided with information, instruction, training and supervision necessary to safely carry out their responsibilities.</li> <li>• Process for ensuring that workers including on-hired workers are only required to undertake tasks and/or operate plant, machinery and equipment that they are appropriately trained, competent or qualified for.</li> <li>• Managers at all levels are accountable and responsible for the safety and health of all workers in their teams, and for ensuring on-hired workers are not placed at risk to their health and safety at client workplaces.</li> <li>• Undertaking not to provide service if a safe and healthy workplace is not available for on-hired workers.</li> </ul>
<p>Excessive hours</p> <p>Likelihood – possible</p>	<p>Manpower Experis Talent Solutions</p>	<ul style="list-style-type: none"> <li>• Fatigue Management Standard in place and applicable to all workers, including fatigue rules.</li> <li>• Overtime management through payroll monitoring and concerns about excessive hours raised with clients.</li> </ul>
<p>Deceptive and coercive recruiting</p> <p>Likelihood – nil</p>	<p>Manpower Experis Talent Solutions</p>	<ul style="list-style-type: none"> <li>• All individuals are free to accept, decline or discontinue work of their own choice, with suitable notice.</li> <li>• Our global Code of Business Ethics and Conduct sets our culture of ethical behavior by being open and honest about our business conduct. It states that in our sales, marketing and communication practices we will strive to present only accurate and truthful information about our products and services in presentations, discussions with clients, our advertising, promotional literature and public announcements. This is reinforced by management and annual training in the Code.</li> <li>• All on-hired workers asked to review and sign A Guide to our Ethical Code, which now includes information about modern slavery and details about how they can report concerns via our Ethics Hotline and how to seek advice from Anti-slavery Australia.</li> </ul>

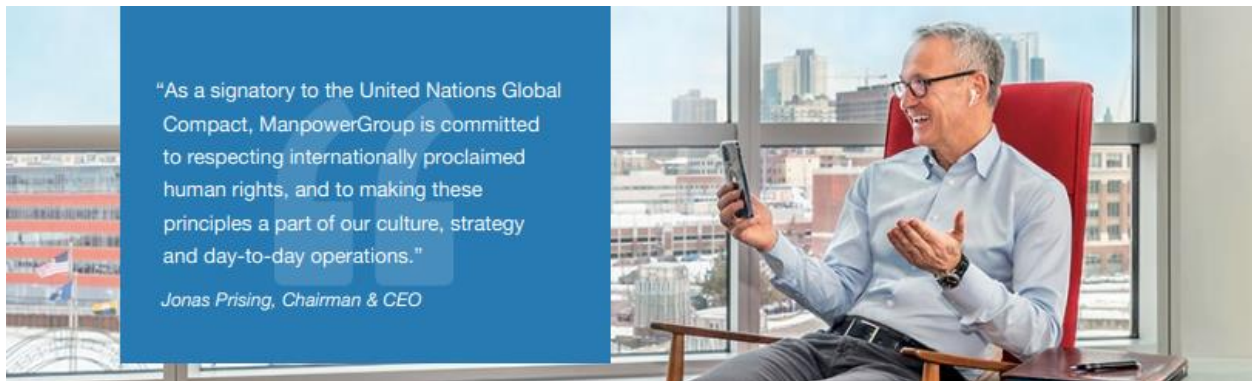
Type of Risk	Relevant Brand	Description and Controls
<p>Underpayment of wages</p> <p>Likelihood – rare</p>	<p>Manpower Experis Talent Solutions</p>	<ul style="list-style-type: none"> <li>• A Modern Awards Pay Guide is maintained by our legal team. It provides an overview of modern awards in Australia and links to supporting information to assist staff to determine the correct award for the particular employee or job, and guidance for reading / interpreting the award.</li> <li>• All on-hired workers are provided with an agreement to read, understand and sign that sets out their specific work and compensation arrangements, including their rights, responsibilities and protections and a link to the Fair Work Act Information Statement.</li> <li>• Proper record keeping, payroll and accounting systems, subject to annual external audits.</li> <li>• Workers are paid directly in to own bank account; individual pay advice is sent directly to each worker's personal email or mailing address.</li> </ul>
<p>Unauthorised payroll deductions, fees or debts</p> <p>Likelihood – nil</p>	<p>Manpower Experis Talent Solutions</p>	<ul style="list-style-type: none"> <li>• Payroll deductions are made upon request by the worker and only for standard types available in our payroll system such as union fees, additional superannuation, child support etc.</li> <li>• ManpowerGroup never charges fees to candidates or workers for employment placement services.</li> <li>• ManpowerGroup does not provide services to obtain work visas or travel to Australia.</li> <li>• Should a payroll error occur leading to overpayment, approval is obtained from the affected worker to have this deducted from their next pay or over a suitable time frame.</li> </ul>
<p>Withholding identity and travel documents</p> <p>Likelihood – nil</p>	<p>Manpower Experis Talent Solutions</p>	<ul style="list-style-type: none"> <li>• Under our work eligibility policy we must sight, review and verify a candidate's identity and work rights documentation, however retention of an individual's original documentation of any kind is prohibited.</li> <li>• All candidates are able to upload their documents electronically for verification so there is no need for them to hand over originals.</li> </ul>

Type of Risk	Relevant Brand	Description and Controls
Substandard accommodation  Likelihood – rare	Manpower Experis Talent Solutions ManpowerGroup Internal Staff	<ul style="list-style-type: none"> <li>We do not provide worker accommodation or supply to clients that do, however there is the potential for this to happen if our staff or on-hired workers are required to travel for work. Mitigation is offered in the form of using our or our client's travel booking agencies.</li> </ul>
Restriction of movement  Likelihood – nil	Manpower Experis Talent Solutions	<ul style="list-style-type: none"> <li>We do not impose any restrictions of personal freedom on our staff or on-hired workforce and should we become aware of this would withdraw on-hired workers from client placements, investigate and refer to the ABF as appropriate.</li> </ul>
Client industry sector and role type  Likelihood – occasional	Manpower	<ul style="list-style-type: none"> <li>Contract review and risk assessment process in place for all instances across ManpowerGroup where our standard Terms of Business are not used. This process considers whether legal, commercial and practical operational obligations are realistic, achievable, priced correctly and that risks are actively identified and managed. Any deviations from our standard position require senior management approval and only company Directors have authority to sign on behalf of the business.</li> <li>Manpower takes care when seeking new clients from industries considered to be at risk of labour exploitation.</li> </ul>
Migrant workers on temporary work visas  Likelihood – possible	Manpower Experis Talent Solutions	<ul style="list-style-type: none"> <li>Under our work eligibility policy, individuals are only considered for work that is within the limitations specified on their work visa.</li> <li>An explanation is provided to applicants that cannot be considered due to visa conditions to explain why not.</li> <li>Work limitations are captured on filled job orders and reflected in role types and end dates. Work hours limitations are monitored by our consultants and through payroll reports.</li> </ul>

## Operations Analysis – Right Management

The nature of Right Management's operations delivering consulting services to organisations means that their exposure to modern slavery risk is within the supply chain rather than day to day operations.





## Raising Awareness with our On-hired Workers

The Guide to our Ethical Code provided to all new on-hired workers now includes specific information about modern slavery risks, how to report concerns and obtain independent advice.

***“We do not tolerate modern slavery practices in any form. If you believe your freedom to refuse, cease or leave employment without suffering detriment (such as threats, coercion or deception against you or your family) has been compromised, or your personal freedoms (such as physical confinement, and/or retention of your identity and travel documents) have been compromised, you may be a victim of modern slavery. Please report your situation to our Global Ethics Hotline. Anti-slavery Australia can provide you with independent advice on (02) 9514 8115 and <https://antislavery.org.au/>”***

We hope that dissemination of this information will help raise awareness amongst workers, their families and communities outside the direct oversight of ManpowerGroup and guide them to assist those vulnerable to exploitation.

It's the least we can do, and we plan to do more, by building additional content about modern slavery into our on-hired worker onboarding program refresh planned for 2022.

## 3.2 Risks of Modern Slavery – Supply Chains

ManpowerGroup uses suppliers drawn from a wide range of industry sectors, including many single sector suppliers. Our supplier base did not change significantly in 2021. The vast majority of our suppliers are Australian companies.

A small number of our tier one suppliers are from overseas, and the types of goods associated with these purchases are mainly IT related for computer software systems and platforms, and business consultancy services. Our overseas suppliers are predominantly from the United States, United Kingdom, Canada and New Zealand. We also interacted with Manpower in Hong Kong and Malaysia, and a Singapore based consultancy firm.

The type of goods purchased from our overseas suppliers do not appear on the [List of Goods Produced by Child Labor or Forced Labor](#) published by the U.S. Department of Labor's Bureau of International Labor Affairs (ILAB).

As reported on in our 2020 Statement, external risk assessment results from a specialist legal firm with expertise in ESG data analytics gave us an independent insight into where the hidden problem of modern slavery is likely to occur. It suggested that whilst ManpowerGroup has a very low risk profile, links to modern slavery practices probably exist in our supply chains, as expected.

However, these links are in the mid-lower tiers of our supply chain well away from any direct oversight we might hope to exercise, and our total theoretical slavery footprint is estimated as being very low at less than one slave per \$M of spend for all suppliers. We note that the risk assessment provided us with a theoretical modern slavery footprint and does not confirm the existence, or nonexistence, of any actual incidence of slavery. The type of modern slavery

risk is not known. We did not undertake external risk assessment in 2021.

**Whilst ManpowerGroup does not directly cause or contribute to modern slavery practices, we remain committed to addressing links to human rights abuses within our operations and supply chain, no matter how small or remote these seem at the point of purchase.**

We are mindful of tier one suppliers from industries considered to be at risk of forced labour exploitation within Australia (construction, cleaning, hospitality and food services).

Additionally, ManpowerGroup does not welcome unethical and exploitative operators being associated with the legitimate employment placement sector that we belong to. Given our level of interaction with business partners from within our own industry sector combined with our own deep industry knowledge and values, we are well positioned as an industry leader to highlight the risks of modern slavery practices and continue promoting best practice in the world of work.

It remains challenging to identify incidences of modern slavery in our supply chain, given the risk lies deeper down the chain in the mid-lower tiers and we recognise that a systems driven approach will be beneficial. A significant finance software upgrade has been scheduled to commence in 2022 with implementation expected in 2023. This will include enhancements to streamline and automate our supplier onboarding process, including capture and assessment of data for modern slavery and other key risks.

## 4. Actions to Assess and Address Modern Slavery Risks

Internal resources allocated to modern slavery includes representatives from the Operations and Legal teams with direct oversight by a senior member of ManpowerGroup's Executive Leadership Team. Their continued focus is to develop and embed a working knowledge of modern slavery within the organisation and recommend how best to implement the modern slavery reporting criteria into our business management systems and practices. They also support the business in responding correctly to customer enquiries for information about modern slavery risk in our operations.

### Progress Against Goals

Our action plan for 2021 was built around the goals outlined in our initial Modern Slavery Statement for 2020. Progress against these goals is summarised here.

Commitment	Key Activity	Status
Standard Operating Procedures	<ul style="list-style-type: none"> <li>Improvements to policies and procedures as detailed in our 2020 Statement were completed and operationally embedded in 2021.</li> <li>Continual monitoring for further improvements related to modern slavery is in place.</li> </ul>	Achieved
Supplier Self-Assessment Questionnaire (SAQ)	<ul style="list-style-type: none"> <li>In 2021 we moved away from a formal procurement function, meaning implementation of our SAQ was reconsidered and paused.</li> <li>Along with this a significant finance software upgrade has been scheduled to commence in early 2022 with implementation expected in 2023. This will include enhancements to streamline and automate our supplier onboarding process, including assessment of modern slavery risks, that will inform targeted use and tracking of our SAQ.</li> <li>Given our low theoretical slavery footprint with slavery links believed to be hidden deeper in our supply chain, an interim manual process for the SAQ at tier one level was not pursued. The SAQ remains available for use as the need arises.</li> </ul>	Paused
Supply Chain Business Partner Policy and Supplier Code of Conduct	<ul style="list-style-type: none"> <li>Implementation is underway primarily through building the weblink into our contract review and risk assessment process where possible.</li> </ul>	Underway

Commitment	Key Activity	Status
Supplier Management Processes	<ul style="list-style-type: none"> <li>• Our master agreements were updated with the weblink to the Australian version of our Supply Chain Business Partner Policy and Supplier Code of Conduct, alongside our modern slavery clause. Should the other party's agreement be used, we seek inclusion of the modern slavery clause and weblink.</li> <li>• Talent Solutions: our MSP and RPO partners are usually contracted directly to our clients. The related document suite was reviewed and will be retired in 2022, to be replaced with a new supplier engagement and management framework covering all types of suppliers.</li> </ul>	Underway
Education and Awareness	<ul style="list-style-type: none"> <li>• Awareness of modern slavery across ManpowerGroup was achieved through communications about changes to policies and procedures updated for modern slavery risks and controls, including the release of the new Australian version of our Supply Chain Policy and Supplier Code of Conduct.</li> <li>• Publication of our first Statement was formally announced to highlight this work and build awareness for client conversations as a supplier of employment services.</li> <li>• Onboarding materials delivered to our in-hired workforce were updated with modern slavery content designed to raise their awareness about modern slavery, how to report it via our anonymous ethics hotline, and how to obtain independent advice from Anti-slavery Australia.</li> </ul>	Underway
Human Rights Due Diligence (HRDD) Framework	<ul style="list-style-type: none"> <li>• An Australian version of our HRDD Framework was released including updates for modern slavery risks.</li> </ul>	Achieved
Formal joint senior management of Modern Slavery work and actions	<ul style="list-style-type: none"> <li>• Directors and senior management representatives from our reporting entities held a formal annual review of actions to assess and address modern slavery risks in our operations and supply chain.</li> </ul>	Achieved

## Human Rights

In 2021 we published our global [Human Rights Policy](#) to reinforce our industry leadership to advocate for ethical recruitment practices, employment flexibility balanced with security, and opportunities for under-represented and vulnerable populations to develop in-demand skills and participate in the formal economy.

Our policy is straightforward: We expect ManpowerGroup employees and business partners to conduct business in a manner that respects Fundamental Principles and Rights at Work. We have a responsibility to comply with all applicable laws in the countries where we do business. Where differences exist between local laws and our standards, the higher standard will prevail.

### The policy outlines our principles:

- **We Have Zero Tolerance Toward Forced Labor and Modern Slavery**
- **We Will Not Tolerate Racism, Discrimination or Harassment**
- **We Support the Right to Freedom of Association and Collective Bargaining**
- **We Protect the Rights of Children and Young Workers and Do Not Engage in Child Labor**

### The policy also outlines our approach to remediation:

- **Should any situation arise where it is determined that individuals' rights have been violated, either through our own practices or those of our business partners, we will take the necessary steps to stop the practice and mitigate the impact to the greatest extent possible.**

## Reporting Mechanism

ManpowerGroup maintains an Ethics Hotline, a 24-hour secure hotline available to employees and the general public to report suspected, planned or actual violations of the ManpowerGroup Code of Business Conduct and Ethics, the law or any other workplace misconduct. This global mechanism available in range of languages and provides a wide range of country access codes to ensure access is readily available to anyone worldwide who has a concern to report, including our business partners, suppliers and their workers. Concerns may be raised anonymously via telephone or the internet.

No issues were raised through the Ethics Hotline in 2021. We continue to promote a high level of awareness of the mechanism internally and externally, whilst recognising this might not reach those who may need it most within the mid-lower tiers of our supply chains. Therefore we do not rely on activity through the Hotline when assessing our modern slavery risk.

## Next Steps

Our action plan for further implementing the modern slavery reporting criteria into our business management systems and practices in 2022 includes:

- **Building on our education and awareness program for our staff and our on-hired workers**
- **Incorporating checks for modern slavery risks into our process for assessing the safety of host workplaces prior to placement of our on-hired workers**
- **Establishing a project to review and redevelop our supplier engagement and management framework**
- **Incorporating supplier risk management into our planned finance software upgrade, as we move to streamline and automate our supplier onboarding process to allow for data capture for the assessment of modern slavery and other risks.**

## 5. Assessing the Effectiveness of Our Actions

In December 2021 directors and senior management representatives from our reporting entities held a formal joint annual review of our actions to assess and address modern slavery risks in our operations and supply chain. Progress against our actions was reviewed and assessed for effectiveness in line with our low risk profile and commitment to addressing links to human rights abuses in our operations and supply chain. Direction was provided for improvements and next steps, in line with our goal to reduce and eventually eliminate any links to modern slavery practices as part of a concerted effort by the business world.

## 6. Consultation Process

Throughout the reporting period covered by this joint statement, regular consultation and updates took place with each of the entities covered by this statement. The consultation process was led by the senior member of ManpowerGroup's Executive Leadership Team responsible for ManpowerGroup's response to the Modern Slavery Act. The consultation undertaken included regular briefings to directors and senior management from each entity. Consultation was also undertaken with the relevant internal stakeholders for each of our actions.

## 7. Other Relevant Information

### Sustainability Commitment

For more than 70 years we have operated globally on the belief that meaningful, sustainable employment has the power to change the world.

We believe businesses have a responsibility to contribute to a sustainable future for work, for workers and for the world. We are driven to lead by example, and we are guided in everything we do by our Values, our Code of Business Conduct and Ethics and the UN Global Compact Principles and Sustainable Development Goals.

At the global level, ManpowerGroup signed up to the UN Global Compact in 2006. We actively support the UN's [Sustainable Development Goals](#) around Education, Gender Equality, Decent Work for Economic Growth and Reduced Inequalities because they are directly related to our core business therefore giving us an opportunity to make a real difference in the areas we can impact most. Learn more about our commitment [here](#).

“Doing well by doing good” was our mantra long before the words were coined. The Sustainable Development Goals fit what our culture has always been. It was important for us to accept the challenge they offer and play a role in advancing their mission. We do that through our own [Sustainability Plan](#), which is built around learnability and employability — getting young people ready for work, helping people skill up and building inclusive workplaces.

### Certifications, Licences and Affiliations

ManpowerGroup maintains certifications against the following Standards:

- AS/NZS 4801:2001 Occupational Health and Safety Management Systems
- AS/NZS ISO 9001:2015 Quality Management Systems
- AS/NZS ISO 14001:2015 Environmental Management Systems

ManpowerGroup holds Labour Hire and Employment Agent Licences in all states and territories that require them including Victoria, Queensland, South Australia, Western Australia and the Australian Capital Territory.

ManpowerGroup have strategic affiliations with industry bodies and diversity groups including:

#### Association of Professional Staffing Companies (APSCo)

ManpowerGroup Australia is a member of APSCo (formerly known as ITCRA) and has held general membership with the group since September 2000. This long-standing association has provided us with support and resources in terms of industry knowledge, events, job board and resume database services as well as regular industry updates.

#### Recruitment and Consulting Services Association (RCSA)

The RCSA Australia and New Zealand sets professional standards, conducts research, educates and develops members' skills, monitors industry developments, and lobbies State and Federal Governments on issues directly affecting members.

In 2006 ManpowerGroup was one of the first to implement the RCSA Service Delivery Standard. In 2017 ManpowerGroup achieved certification against the StaffSure Standard developed by the RCSA in conjunction with independent certification firm, SGS. The Staffsure Certification scheme makes it simple for business, government and workers to find and partner with reputable Workforce Service Providers such as labour hire companies, professional contracting firms and private employment agencies.

### **The World Employment Confederation (WEC)**

The WEC is voice of the private employment services industry at the global level, representing national federations as well as workforce solutions companies from across the world. As a founding member of the WEC ManpowerGroup is committed to the prevention of human trafficking, and to not charging any fees or costs to job seekers or workers (whether directly or indirectly) in both national and international settings.

At a global level, ManpowerGroup are annual attendees and contributors to the World Economic Forum (WEF). This forum sets the stage for the Group to learn, discuss and provide input into the macro and micro economic issues which then contribute to the shape of our own focus and priorities.

## **8. Approval**

This statement has been reviewed and approved by the principal governing body of each reporting entity covered by it and is signed by an authorised officer of each of those reporting entities.



**Penny O'Reilly**  
Managing Director  
Manpower Services (Australia) Pty Ltd  
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**Tim Roche**  
Country Manager  
Right Management Consultants Pty Ltd