



Method Modern Slavery Statement

For the Reporting Period: 01 January 2024 to 31 December 2024

This statement is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) on behalf of Method

Structure and Operations

This Joint statement is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) on behalf of:

- **Method Recruitment Group Pty Ltd**, trading as Method Recruitment Group
- **Method Services Pty Ltd**, trading as Method Services

together referred to in this Joint Statement as 'Method'.

Method Recruitment Group and Method Services are Australian private companies.

Method Recruitment Group is the recruitment and labour hire arm of the Method Group and Method Services is the IT services and consultancy arm. The Method Group engages circa 200 contractors/consultants to provide specialist IT services to its clients across Australia and New Zealand, and it employs approximately 50 internal staff to manage those client relationships and to provide the back-office support required.

Method Group does not tolerate slavery, human trafficking, forced or child labour or child exploitation of any kind. Method is committed to respecting human rights and fair labour practices and working with its suppliers and clients to eradicate forced labour in Australia, NZ and beyond.

Method recognises the responsibilities it has within the supply chain to provide skilled labour to its clients and to ensure that all the workers it engages (directly and indirectly through a 3rd party supplier) are treated fairly, ethically and in compliance with legislative requirements. Method's policies, procedures and practices are designed to protect human rights throughout the recruitment, selection and placement cycle and throughout all assignments and projects it performs for its clients. Method also takes steps to ensure that its suppliers of back-office supplies and services also meet the same high standards. Method does not manufacture or sell physical products.

In Australia, both Method Recruitment Group and Method Services operate under the same policies and procedures, have the same senior leadership team and share many of the same suppliers. The process of consultation between Method Recruitment Group and Method Services (for the purpose of drafting, reviewing and submitting a joint statement) was to hold a meeting between the Directors and the Board for both Method Recruitment Group and Method Services and the Method Support Team to discuss Method's policies and procedures in relation to modern slavery and consult on the drafting, reviewing and submitting of a joint modern slavery statement (for Method Recruitment Group and Method Services). This Joint Statement is a single, consolidated description of the actions of both Method Recruitment Group and Method Services to address modern slavery, and it has been approved by the Directors of Method Recruitment Group and Method Services and by the Board.

Relevant Method Policies and Procedures

Method has in place the following policies and procedures to assist it in managing human rights, promoting diversity and ensuring compliance with legislation.

Contractor Induction Checklist, Workplace Inspection Checklist & WorkPro eLearning Compliance

The checklists describe the steps we take to identify and eliminate WHS risks and promote workplace safety (including conducting safety inspections at host client sites and providing training and inductions). Method also requires its host clients to provide a safe workplace for our workers and requires workers themselves to work safely and consider the health and safety of those around them. We ensure this by utilizing WorkPro eLearning compliance which requires pass rates for the following required modules:

- Working from Home Safely Checklist
- Working Safely from a Home Office
- Work safely from Anywhere v3
- Safety, Discrimination, Harassment & Bullying in on-hire work v9
- Privacy v4
- Australian Casual Employment Information Statement v5

Cultural Effectiveness and High Performing Conduct

Our Cultural Effectiveness and High Performing Conduct is the Method Code of Conduct which outlines the requirement for our staff to act ethically and responsibly in all the work they do for Method. Employees are required to ensure compliance with industry best practice, agreements and applicable legislation, including following/enforcing WHS procedures, privacy, and avoiding/preventing discrimination, harassment, bullying, bribery & corruption and modern slavery in our business and in our supply chain.

Client Contractor Agreement

This Contractor Temporary Engagement Agreement is an agreement including agreement on reasonable hours to be worked, prompt payment of wages, and other obligations. This Agreement was created in alignment with Fair Work Australia guidelines.

Method Terms and Conditions Statement

The Method Terms and Conditions statement is an agreement which covers confidentiality, employee's suitability and express communication of employee working needs and requirements, ensuring payment for time worked and other reasonable payment for work, and other obligations. This Agreement was created in alignment with Fair Work Australia guidelines.

Method Modern Slavery Complaints Procedure

Our Modern Slavery Complaints Procedure provides guidance and protections to Method personnel and external clients, candidates, contractors and third parties to enable them to report suspected unlawful/unethical behaviour to Method Management to ensure legal and ethical standards are maintained in line with this statement.

In addition to the policies mentioned above, our comprehensive policy suite includes the following people and human rights focused policies:

- Cultural Effectiveness and High Performing Conduct
- Method Employee Handbook
- Privacy Policy
- Privacy Collection Statement

- Flexible Working Policy
- Leave Policy
- Mobility Policy
- Animals in the Workplace Policy
- Parental Leave Policy
- Performance Policy
- Sexual Harassment Policy
- Alcohol and Drugs Policy
- Corporate Governance Policy
- Environmental and Sustainability Policy
- Generative AI Usage Policy
- Corporate Social Responsibility Policy
- Equal Employment Opportunity Policy
- OHS Policy Statement
- Grievance Procedure
- Modern Slavery Complaints Procedure

Method's Approach to Managing Modern Slavery Risks

As well as ensuring the Method policies and procedures are communicated to the relevant parties (including suppliers) and are understood and complied with, we ensure that:

1. We do not charge any fees to individuals to allow them to register with us, join our database, gain access to job opportunities or apply for our jobs.
2. For all workers (internally providing services to the Method and externally providing services on our behalf to our clients, whether they are engaged as freelance professionals/contractors or employees);
 - a) they are provided with clear and comprehensive written terms and conditions (including in relation to rates of pay/fees, hours and location of work, duties and responsibilities and client requirements, as applicable);
 - b) the employment contracts comply with all applicable employment-related legislation;
 - c) they are given the opportunity to discuss and negotiate terms (to the extent that we have flexibility under the relevant work order from the client) and they have a strong bargaining position due to shortages in IT professionals and recruiters; and
 - d) there is no pressure on those individuals to apply for or accept work and they can terminate their engagement (in accordance with the contract terms) at any time.
3. An individual has the appropriate work rights to live and work in Australia/NZ, as required. We ask to see copies of passports and visas and confirm this through official websites designed for this purpose (e.g. Vevo checks).
4. Any business supplying labour hire services to Method (that is required to have a labour hire licence) has the appropriate licence in place and is required to provide evidence of this and its currency (and there are procedures in place to confirm the licence details).
5. All our legal obligations are complied with in the recruitment and on-boarding process (including WHS requirements).

6. We do not supply accommodation directly for our employees and contractors (other than occasional overnight accommodation in hotels where they are required to undertake short business trips for work). Hotels or Airbnb's are generally minimum 3 star and approved by the individual.
7. Our systems and procedures (including for generating and approving new contracts and giving workers access to timesheets etc) have controls in place that aim to prevent placements from occurring without the appropriate checks having been performed (including work rights checks, police checks where required, labour hire licence checks, obtaining privacy consents, confirming WHS training and inductions have taken place, obtaining banking and superannuation instructions, returning signed contracts etc). Systems are in place to note expiring visas/licences and to follow up on missing documentation.
8. We provide ongoing training for our consulting staff who are responsible for sourcing and placing candidates (on utilising our CRM system and implementing our practices and procedures) on a regular basis. Consulting staff are also required to complete the same compliance as contractors, to ensure they fully understand their obligations to their placements
9. We provide training for our internal administration/contracts management and accounts/payroll and HR staff who are responsible for checking all recruitment and on-boarding practices and procedures have been followed.

Method's approach to Supplier Risk Management

Our Modern Slavery Framework includes the following:

- Modern Slavery Statement (this document)
- Mapping of Suppliers
- Review of Supplier Agreements
- Modern Slavery Reporting (as required by law)

We have adopted a risk-based approach to managing any potential modern slavery vulnerabilities within our business and our supply chain. Whilst we consider the risk of modern slavery within our direct business operations to be low, we do recognise that through our supply chain we can be exposed to the risk of modern slavery.

We have used external resources (including the Department of Home Affairs Guidance), advice from professional bodies (such as APSCo) and activity within our industry to inform our risk assessment approach.

Mapping of Method's Supply Chain

We have mapped our supply chain, noting all major suppliers to our offices/businesses in Australia.

Included in Method's supply chain are suppliers of: recruitment/labour hire/payroll services (for internal use and to assist in meeting the needs of our clients); professional services (including marketing, accountancy, auditors, debt collection, lawyers, training, marketing services etc); insurance; IT hardware and infrastructure, software and maintenance; cleaning; office maintenance; couriers and postal services; document storage and disposal; office supplies (flowers, fruit, coffee, plants, water, stationary); office security; entertainment, external learning and development facilitators and trainers; catering and alcohol; travel and utilities.

Key Indicators & Supplier Review of Modern Slavery Risks

Within our supply chain, the following have been identified as key indicators of modern slavery risks:

- High risk countries/areas – e.g. countries with less stringent labour laws and/or high poverty
- High risk products/services – e.g. those involving unskilled/physical/factory work
- Vulnerable populations – e.g. staff on temporary visas and young/disadvantaged/non-Englishspeaking staff;
- Business models with high risk practices – e.g. commission-only pay arrangements, paid in food/accommodation, isolated/remote/live-in work

Where multiple high-risk indicators co-exist, there is a greater likelihood of modern slavery and additional controls are required. Relevantly for our business, we have focused on suppliers of labour (in particular those based/operating overseas) and certain more vulnerable industries utilising lower paid workers.

To gauge the effectiveness of our modern slavery approach, and under the guidance and supervision of the Board, Method is supported by a dedicated support team who are responsible for risk and compliance. This team helps oversee compliance of our employees, contractor staff, suppliers, and extended supply chains. The support team, along with its adherence to internal policies and practices undergoes ongoing scheduled and 'as required' checks and reviews throughout the year as well as input from external legal and compliance specialists.

Upon entering into new contracts with new suppliers or reviewing/updating contractual arrangements with existing suppliers, agreements are reviewed and (where appropriate) relevant provisions are inserted regarding modern slavery. These are conducted by the Method Support Team with a focus on compliance in the following areas:

- Ensuring lawful/proper recruitment practices
- Avoiding forced /Child Labour
- Avoiding Debt Bondage
- Ensuring fair Wages & Conditions
- Allowing for workers to terminate their employment/engagement

Suppliers may be required to provide further information and/or participate in an audit and, if required, suppliers will be required to cooperate with Method in taking action to mitigate/remove any identified risks of modern slavery.

Where possible, we are reviewing our supplier list and adding new suppliers which fit at least one of the following criteria:

- First Nations owned and run business
- BCorp Certified
- Employees are from a disadvantaged background, eg homeless
- Employees are people with a disability
- Women owned and run businesses

Follow-up Action

We will continue to review and adapt our modern slavery framework, including:

- assessing the effectiveness of the actions we have taken to date
- requiring suppliers to update the Supplier Questionnaire regularly to monitor progress
- performing gap analysis and continuous improvement of our existing controls
- designing and drafting enhancements (or new controls) to respond to identified risks, in the form of documentation, policies, processes, training and amendments to supplier contracts.

As required by law, we will report to the relevant authorities on our modern slavery practices and relevant findings.

Approval

This Modern Slavery Statement was reviewed and approved by the Founding Director of Method Recruitment Group and Method Services on 23rd January 2025 on behalf of the Board of Directors. This statement was ratified by the Method Recruitment Board of Directors at the 23rd January 2025 board meeting.

1. This Joint Statement is approved by **Method Recruitment Group Pty Ltd**:

Steve McCourt

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Signature of Stephen McCourt, Founding Director, on behalf of the Board of Directors of Method Recruitment Group

2. This Joint Statement is approved by **Method Services Pty Ltd**:

Steve McCourt

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Signature of Stephen McCourt, Founding Director, on behalf of the Board of Directors of Method Services