

# Modern Slavery Statement 2023



## Introduction:

This Modern Slavery Statement (**Statement**) covers the activities of Employment Hero Holdings Pty Ltd (ACN 611 036 796) (**Employment Hero Holdings**) and its related entities (**Employment Hero**) for the period of 1 July 2022 to 30 June 2023 (**Reporting Period**) and has been prepared to comply with obligations under the Modern Slavery Act 2018 (Cth) (**Australian Act**) and the Modern Slavery Act 2015 (UK) (**UK Act**).

Employment Hero recognises the importance of combating modern slavery around the world and identifying the potential risks that may arise.

This Statement shows Employment Hero's commitment to preventing modern slavery throughout its business operations and supply chains, and the measures it has taken by implementing policies and processes to help assess, monitor, and mitigate any risks of modern slavery.

## About Employment Hero

Employment Hero is on the mission to revolutionise the way the world works. Born in 2014, the company has established itself as a global leader in the employment tech space, driven by its unwavering mission to make work easier and lift employment to new heights.

Employment Hero recognises the intricate complexities and ever-evolving demands of the modern workplace.

By delving into the heart of global employment needs and challenges, Employment Hero is driven by innovation to bring solutions that help businesses, and their employees thrive.

Employment Hero empowers businesses to embrace the future of work, where efficiency, innovation, and employee well-being are at the forefront.

## Structure, operations and supply chains

### Structure

Employment Hero Holdings is headquartered in Sydney, Australia, and is the parent company of the Employment Hero group.

This Statement covers multiple Employment Hero corporate group entities including Employment Hero Pty Ltd, Employment Hero UK Limited, Employment Hero Pte Ltd, Employment Hero NZ Limited, Employment Hero Sdn. Bhd., EH Philippines Inc, Employment Hero Vietnam Limited, Remote Hero (Australia) Pty Ltd and Webscale Pty Ltd, together with the other (directly or indirectly) wholly owned subsidiaries of Employment Hero Holdings.

As part of our actions to control and mitigate modern slavery risks, and in preparation of this statement, Employment Hero has consulted with entities under its control. Employment Hero's modern slavery program is managed by its group finance, procurement and legal functions based out of Sydney, Australia, with assistance from employees of Employment Hero group entities in the other jurisdictions in which Employment Hero operates as necessary.

As the Employment Hero group entities are wholly owned (directly or indirectly) by Employment Hero Holdings, the operations and supply chains of these subsidiaries are addressed in this Statement. All Employment Hero group entities follow the policies and processes as set and directed by Employment Hero Holdings.

Employment Hero provides its services in Australia, United Kingdom, New Zealand, Singapore, and Malaysia with a remote-first workforce of over 900 employees worldwide.

### Operations

Employment Hero provides a cloud-based platform that has expanded its services beyond its core HR, payroll and employee benefits offerings to provide a full suite of AI powered employment products, services and features. Employment Hero provides its customers a platform driven by the company's mission to make employment easier and more rewarding for everyone with services that support SMEs run their business more efficiently and gives employees and job seekers the tools to fight the rising cost of living and gain control over their finances.

Employment Hero's all in one human resources and payroll platform is offered under a multi-tier subscription model with the products and services provided including employee management, recruitment and onboarding, business performance management, governance, and an all-in-one payroll solution. Employees can use the platform to manage their employment, access important information about their workplace, and engage with their employer.

In 2023, Employment Hero launched the world's first ever employment superapp under its newly formed 'Swag' brand by rolling work, career progression, wages, savings and exclusive benefits all together under 4 key pillars - Work, Money, Benefits, Career - to supercharge the user's experience of being employed.

## Range of Employment Hero services:

- HR and payroll software
- Swag app (world's first employment superapp)
- 'Benefits' (discounts, cashbacks and megadeals offered through the Swag app)
- 'Money' (financial products and services offered through the Swag app)
- Swag jobs board
- Applicant tracking system
- Global Teams employer of record services
- Learning and development
- AI enhancement features within the platform

## Supply chains

Employment Hero's supply chains support both the delivery of its services to customers and the running of its day-to-day business operations.

In providing a SaaS platform to customers, the business operations involve the direct employment or engagement of workers for the development and provision of products and services.

Additionally, Employment Hero works with suppliers of products and services including software, leasing and use of real estate, the procurement of personal computing devices, office equipment and technology, and other business and promotional services.

## Employment Hero's supply chain includes the procurement of the following types of products and services:

- Technology including software and hardware
- Professional services
- Marketing services including promotional materials
- Merchandise
- Rent and office suppliers
- Events, travel and hospitality

Employment Hero has identified software services, marketing, and professional services to be the industries in which most of its suppliers are based. An audit of all suppliers show that they are primarily located in Australia, United Kingdom and the USA. A full breakdown of Employment Hero suppliers by region is provided in the table below.



## Percentage of Supplier per Region

Location	Percentage
Australia	54.4%
Canada	0.45%
European Union	1.19%
United Kingdom	15.65%
Malaysia	2.09%
New Zealand	7.00%
Philippines	0.60%
Singapore	5.96%
United States of America	12.67%

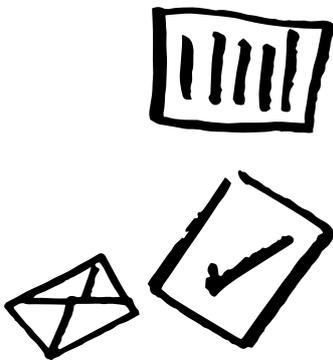
Employment Hero does not engage with any suppliers located in countries deemed as high risk according to the Global Slavery Index.



## Modern slavery risks

Employment Hero has a zero-tolerance attitude towards modern slavery and has put in place systems and processes to help recognise and assess modern slavery risks within its business operations and across its supply chains. As a cloud-based software service, Employment Hero's core business operations present a low risk of modern slavery.

In saying this, Employment Hero recognises that modern slavery risks may still be present, especially when taking into account the vast network of third-party providers.



## Workforce risks

Employment Hero is mindful of the global potential for exploitation in the recruitment process and maintains a vigilant approach to preventing modern slavery within its internal workforce. Being a remote-first company, Employment Hero recognises the challenges that come with ensuring everyone within its workforce has their workplace rights and entitlements protected and maintains compliance with local and international labour laws.

## Supply chain risks

Employment Hero recognises the risk of modern slavery within its supply chain, particularly in the production of merchandise and suppliers involved in overseas events or off-sites. By the nature of Employment Hero's software-based business services, the company does not contract with large manufacturing companies that generally present high risks of modern slavery with their operations or supply chains. Employment Hero also engages mostly with reputable third-party providers in the SaaS sector which present low modern slavery risks. Employment Hero did not detect any material risks within its supply chain and determined its overall risk to be low with the majority of Employment Hero's suppliers operating in low-risk industries and jurisdictions.

# Actions to control and mitigate modern slavery risks

## Internal policies and training

All employees at Employment Hero play a crucial role in identifying and preventing modern slavery within the organisation and its supply chain. To equip them with the knowledge and tools necessary to recognise and respond to modern slavery risks, the business issues a modern slavery policy to be read and acknowledged by all employees and provides mandatory training.

### The training covers the following areas:

- identifying signs of modern slavery
- policies and procedures related to modern slavery
- reporting mechanisms and the importance of reporting
- the consequences of engaging in or supporting modern slavery

By educating the business's employees, Employment Hero aims to create a workforce that is vigilant and empowered to actively contribute to the prevention of modern slavery within its business operations and supply chain.

Employment Hero's workforce consists of qualified employees under contracts that comply with local and international labour laws and regulations, and employees or contractors are hired based on their skills, qualifications, and suitability for the role, without any form of exploitation.

Employment Hero's employer of record services necessitate a thorough examination of compliance with relevant labour laws and ethical employment practices in the countries where this service is provided. The company aims to uphold the highest standards in its role as an employer of record.

## Supplier Code of Conduct

A key measure to combat modern slavery across Employment Hero's supply chain is the incorporation of the Supplier Code of Conduct in any engagement with suppliers. This document serves as a foundation for ethical business relationships and outlines the principles and standards that all suppliers are expected to adhere to. The Supplier Code of Conduct gives particular focus to, and prohibits, any form of forced labour, child labour, or any other violation of fundamental human rights. Suppliers are also required to adequately compensate workers, ensure that working hours do not exceed the legally accepted maximum set by local laws, and provide workers with safe and hygienic work environments.

## Modern Slavery Attestation

As part of Employment Hero's ethical procurement process, all suppliers are required to complete and sign a Modern Slavery Attestation. This attestation is a comprehensive document that goes beyond mere compliance, serving as a tool for education and awareness for suppliers.

By answering specific questions in the attestation, suppliers can explore their own practices and compliance with modern slavery frameworks, and simultaneously provide Employment Hero with an undertaking of such compliance.

## Whistleblower policy and mechanism

Transparency and accountability are key principles that must be in play to address modern slavery risks across business operations. Employment Hero has implemented a robust Whistleblower Policy designed to empower employees, contractors, and stakeholders to report any concerns or suspicions related to modern slavery without fear of retaliation. This policy serves as a crucial component of the business's risk mitigation strategy and provides a clear mechanism for individuals within the company's business operations to report a modern slavery issue.

The Whistleblower Policy is a living document that undergoes regular review. Employment Hero will actively seek feedback from stakeholders to identify areas for improvement, ensuring that the policy remains effective and aligned with best practices to combat modern slavery risks.



## Effectiveness of actions and controls

Employment Hero is focused on implementing the modern slavery risk mitigation measures in the most impactful way possible and considers the existing measures to be reasonably effective in identifying and mitigating modern slavery risks. The measures that have been put in place give an opportunity for staff within the company to be educated about the issue, and the procurement processes in place call for supplier engagement which gives assurance that the necessary human rights standards are met.

Employment Hero will carry out regular communication, audits, and evaluations of the company's policies and processes which will be an ongoing effort to ensure effective monitoring and assessment of modern slavery risks in its operations and supply chains.

Employment Hero plans to integrate with specialised third-party tools to improve its understanding of the modern slavery risks and evaluate deeper levels of the supply chain. This step will help identify flaws in the company's existing mitigation measures and shows its commitment to continuous improvement in addressing modern slavery risks.

## Approval

This Statement was approved by the Board of Directors of Employment Hero on 20 December 2023.

**Signed on behalf of Employment Hero  
by Benjamin Thompson (CEO):**

