

Modern Slavery Statement

Reporting Period: 1 July 2023 to 30 June 2024

Reporting Year: 2

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 (**together, Employment Hero, we or us**).

This is our second Modern Slavery Statement (**Statement**) covering the period of 1 July 2023 to 30 June 2024 (**Reporting Period**), which has been prepared to comply with our 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 within our business. This Statement shows our continued commitment to mitigating the risks and our aim to prevent modern slavery throughout our business operations and supply chains, and the measures we have taken by implementing policies and processes to help assess, monitor, and mitigate such risks.

Employment Hero is committed to upholding the aims and requirements under the Australian and UK Acts. We understand that there have been several significant developments in this space including the publication of the Commonwealth Government's review into the Modern Slavery Act, the NSW Anti-Slavery Commissioner's reasonable steps guidance on the Modern Slavery Act 2018 (NSW), the appointment of the Federal Anti-Slavery Commissioner and the release of the Walk Free Global Slavery Index 2023. We will continue to monitor changes to the modern slavery regulatory landscape and consider what implications this may have on our anti-modern slavery initiatives.

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. Our registered office is located at Level 2, 439 Kent St, Sydney NSW 2000.

This Statement covers multiple Employment Hero corporate group entities including (amongst others):

- Employment Hero Pty Ltd;
- Employment Hero UK Limited;
- Employment Innovations Group Pty Ltd;
- Employment Innovations Payroll Uk Ltd;
- 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.

A full list of Employment Hero Holdings' affiliates can be found on our website at <https://employmenthero.com/legals/privacy-policy/data-processing/affiliates/>.

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 global 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 1300 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 to 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

In early 2024, Employment Hero Holdings also acquired Employment Innovations – one of Australia’s leading providers of employment services. Employment Innovations has thirty years of managed payroll and HR advisory expertise that was integrated into Employment Hero’s team and platform.

Globally, we service over 300,000 businesses, manage over 2 million employees and process over \$100bn in payroll annually. We provide managed payroll to our customers across Australia, New Zealand, the UK, Singapore and Malaysia. Customers in Australia and New Zealand can also benefit from HR advisory.

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; and
- 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, Singapore and the USA. A general breakdown of Employment Hero suppliers by region during the reporting period is provided in the table below.

Percentage of Supplier per Region

Location	Percentage
Australia	60%
European Union	4%
United Kingdom	7%
Malaysia	1%
New Zealand	1%
Singapore	11%
United States of America	16%

Employment Hero does not engage with any suppliers located in countries deemed as “high risk” according to the 2023 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 lower risk of modern slavery. In saying this, Employment Hero continues to recognise that modern slavery risks may still be present, especially when taking into account our 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.

We are also aware of other risks remote-first businesses like ours may face, such as a lack of oversight of working conditions of employees including excessive working hours, unethical uses of technology and data, lack of concrete reporting mechanisms and cultural/geographical disparities. Employment Hero has taken steps to mitigate these workforce risks as explained in the actions we take to assess and address the risks of modern slavery in our operations and supply chains.

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, including our yearly company gathering. 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 within their operations or supply chains. Employment Hero also engages mostly with reputable third party providers in the SaaS sector which present lower modern slavery risks. We recognise that our greatest risks related to modern slavery may arise in connection with our in-person events, particularly our annual company gathering, and more broadly, in relation to hospitality, and merchandise procurement, as these are generally considered higher risk industries. These areas involve complex supply chains and the potential for labor exploitation, which requires ongoing vigilance. For our annual company gathering, we use an external supplier, Power2Motivate, who organises all accommodation, travel and hospitality. Whilst they undertake modern slavery due diligence as part of organising the event, this is a risk we are aware of and continue to mitigate.

We are pleased to confirm that we have not identified any instances of modern slavery in our supply chain during the Reporting Period. We remain committed to assessing and addressing these risks to uphold ethical practices across all aspects of our business.

During the Reporting Period and beyond, Employment Hero did not engage with any suppliers in the countries identified in the 2023 Global Slavery Index as those where modern slavery is most prevalent or as countries taking the least action in respect of combating modern slavery.

Actions to control and mitigate modern slavery risks

While we are committed to upholding our obligations under the Australian and UK Act, we are still in the early stages of our modern slavery compliance journey. Over the next few reporting periods, we aim to undertake a high-level risk assessment of our operations and supply chains to see where our key risks lie, and implement an anti-modern slavery roadmap accordingly.

The Employment Hero group of entities takes a group-wide approach to modern slavery, with clear policies, procedures and processes to mitigate risks of modern slavery in our operations and supply chains.

Compliance controls

At Employment Hero, we have compliance controls in place which relevantly include annual reviews of our employees' contracts and performance reviews, to ensure that their working conditions and pay meet the legislated standards.

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. We aim to uphold the highest standards in its role as an employer of record.

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. During the reporting period, we reviewed and updated our Modern Slavery Policy to ensure clear escalation of issues and key responsibilities of staff.

The mandatory 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.

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.

Code of Conduct and Ethics

The Employment Hero Code of Conduct and Ethics outlines the standards and expectations for behaviour and practices that align with the company's core values and ethical principles.

It covers aspects such as professional integrity, respect for colleagues, adherence to workplace safety, non-discrimination, and anti-harassment policies. The code also emphasises compliance with legal and regulatory requirements, the responsible use of company resources, and confidentiality. Furthermore, it promotes a culture of ethical decision-making and accountability by providing guidelines for reporting misconduct, conflicts of interest, and breaches of ethical conduct to ensure a fair, inclusive, and respectful work environment.

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 have the opportunity to 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. During the Reporting Period, we reviewed and updated our Whistleblower Policy, including updating relevant escalation processes.

Monitoring the modern slavery regulatory landscape

Employment Hero continues to keep informed by considering guidance issued by the Australian Government and independent reports in respect of the Australian Act.

We are aware that:

- the Australian Government published its Report of the statutory review of the Australian Act (the "Report");
- the Australian Government is in the process of reviewing and responding to the recommendations tabled in the Report to reform the Australian Act;
- there have been other major developments in this space including the publication of the 2023 Global Slavery Index; and
- in 2024, the Australian Government appointed its first Anti-Slavery Commissioner.

We will continue to monitor such developments and aim to report on our progress in future reporting years.

Effectiveness of actions and controls

Employment Hero is focused on implementing the modern slavery risk mitigation measures in the most impactful way possible. We consider that 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.

We intend to use key performance indicators (KPIs) to measure how effective we have been in identifying and mitigating modern slavery risks in our supply chain. Based on these KPIs, we will continually assess and improve our modern slavery compliance framework.

Employment Hero will continue to 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 also continues to plan integrating 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.

No.	Key Objective	KPI
1	Awareness and education of modern slavery within the business	How many staff have attended training and acknowledged the Modern Slavery Policy
2	Monitoring the issues (if any) reported in accordance with our Whistleblower Policy and/or Code of Conduct and Ethics	This will be measured by how many issues are reported and how many are resolved.
3	Explore establishing a Modern Slavery Working Group	Engaging in internal discussion regarding the establishment of a Modern Slavery Working Group tasked with implementing our anti-modern slavery program over the next few reporting periods.

We will report back on these key objectives and KPIs in our next Statement.

We also confirm we have not identified any specific instance of modern slavery during the Reporting Period impacting the Employment Hero during the Reporting Period.

Consultation

Employment Hero Holdings is making a 'joint statement' for the purpose of the Australian Act and is required to consult with the entities it owns and controls (i.e. members of the Employment Hero group of entities). In accordance with the Modern Slavery Act and best practice guidance issued by the Attorney-General's Department, this single Statement has been developed in consultation with all entities in the Employment Hero group. We have also prepared this Statement with input from our internal stakeholders, including our legal and procurement teams.

Approval

Principal Governing Body Approval

This modern slavery statement was approved by the Board of Employment Hero Holdings Pty Ltd (ACN 611 036 796) in accordance with section 13 of the Modern Slavery Act 2018 (Cth) on 18 December 2024.

Signature of Responsible Member

This modern slavery statement is signed by Benjamin Thompson in his role as Chief Executive Officer of Employment Hero Holdings Pty Ltd (ACN 611 036 796) (in accordance with section 13 of the Modern Slavery Act 2018 (Cth)) on 18 December 2024.



ANNEXURE A:

Mandatory criteria

Mandatory Criteria:	Page Numbers
a) Identify the reporting entity.	3
b) Describe the reporting entity's structure, operations and supply chains.	3-4
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	5
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	6-7
e) Describe how the reporting entity assesses the effectiveness of these actions.	8
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	9
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	N/A