



RGF Staffing ANZ Pty Ltd

Modern Slavery Statement

Period: 1st April 2025 – 31st March 2026



Our Structure

This Statement is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth) and sets out the actions taken by RGF Staffing ANZ Pty Ltd (ABN 84 603 568 403) covering the reporting period 1 April 2025 – 31 March 2026. This Statement should be read in conjunction with our previous Modern Slavery Statements and reflects our continued focus on strengthening governance, supplier engagement and responsible labour practices.

Who we are

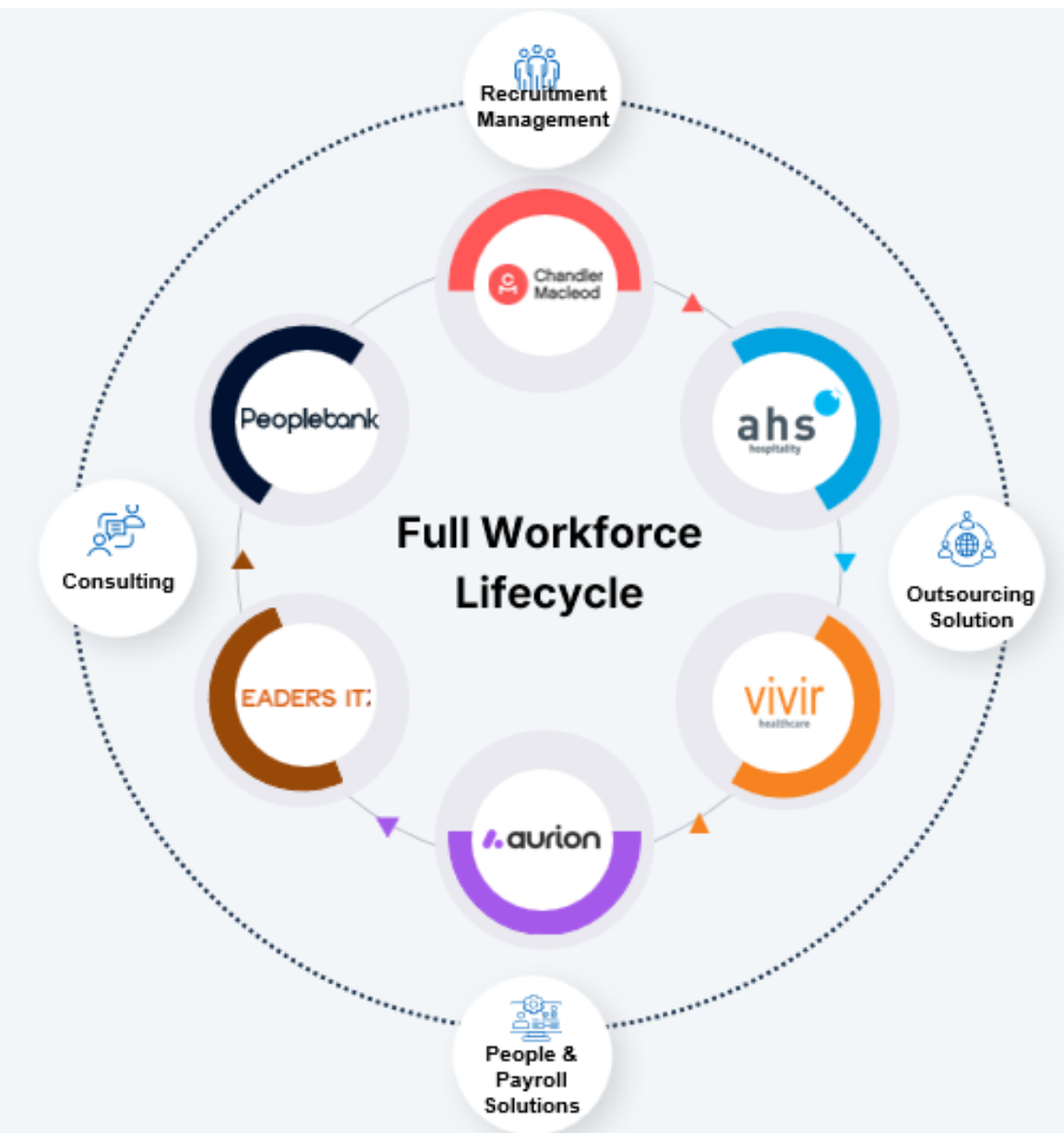
RGF Staffing ANZ Pty Ltd is a wholly owned subsidiary of the global RGF Staffing Group, headquartered in the Netherlands. RGF Staffing is part of the wider group of companies owned by Recruit Holdings, listed on the Tokyo stock exchange.

RGF Staffing ANZ operates across Australia, New Zealand, Hong Kong and Singapore, providing professional recruitment and workforce solutions, we operate through a collection of brands.

Our Services

- Permanent recruitment
- Temporary and contract recruitment
- Labour hire
- IT contracting and professional services
- Payroll processing and SaaS services
- Hospitality and Commercial Cleaning
- Healthcare Workforce Solutions

Our services are delivered through a combination of corporate employees and on-hire workers engaged in compliance with Australian and New Zealand workplace laws.



Our Operations and Supply Arrangements

Operations

RGF Staffing ANZ provides recruitment, workforce and service delivery solutions to clients across a diverse range of industries. Our operating model consists of labour-focused, service-based, SaaS and managed services, with the majority of workers engaged directly by our various Brands and assigned to client sites under contract arrangements.

Supply Arrangements

Our supply chain is primarily Australian and New Zealand-based and predominantly consists of professional and business services, including:

- IT and technology support
- Payroll and workforce management services
- Professional services (legal, audit and advisory)
- Marketing, communications and training providers
- Facilities and office services
- Qualified healthcare professionals

Our supplier engagements may be governed by:

- Multi-year contracts with defined performance standards and ethical obligations
- Short-term purchase order terms and conditions

Supplier reviews are conducted prior to the engagement of new suppliers, including completion of our Modern Slavery Risk Assessment and acknowledgement of our Supplier Code of Conduct. After that, arrangements are reviewed annually or at renewal, with review frequency adjusted based on assessed risk.

Key Risk Areas

RGF ANZ recognises that modern slavery risks can exist in all industries and supply chains. Based on the nature of our operations, we identify that our most relevant risk areas include:

- Labour hire and recruitment activities involving vulnerable workers.
- Use of subcontractors engaged by suppliers or clients
- Offshore or outsourced services used by suppliers, particularly in IT and digital services.

Risk Profile

Given the professional, services-based nature of our business and supply chain, the overall inherent modern slavery risk is assessed as low to moderate. Residual risk remains where:

- Supply chains become complex or multi-tiered
- Services are delivered offshore
- Visibility of labour practices is reduced
- The workforce is made up of seasonal or low skilled workers.

Our risk indicators have not changed significantly since the last reporting period.

These include:

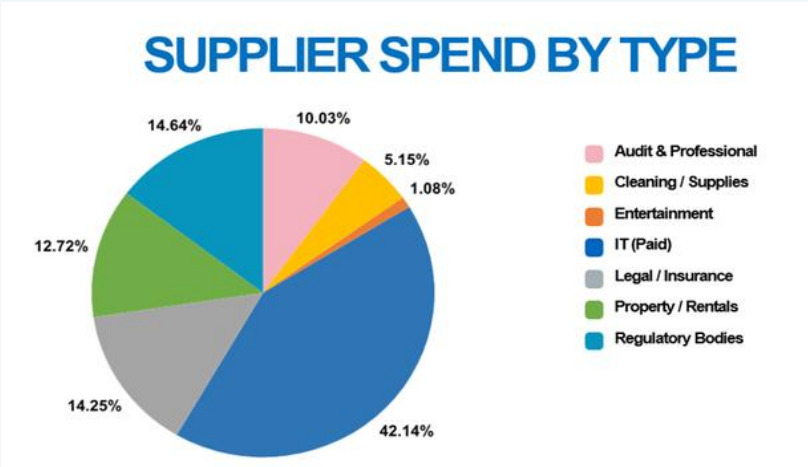
MODERN SLAVERY RISK INDICATORS	
GEOGRAPHY	LOW GOVERNANCE
Remote worksite locations	Gaps in public policy / human rights
Supplier operates in a high risk location	Gaps in company policies
WORK TASKS	Poor credit ratings
Work itself if high risk or dangerous	No or inadequate grievance / reporting systems
Physically demanding work	Constant changes in personnell / supervisory roles
Limited visibility / oversight at the worksite	COMPLEX ARRANGEMENTS
Safety is not a focus (Client / Supplier)	Recruitment through 3rd parties with downstream suppliers
Training is not a focus	No "site visit" policies
Seasonal / Transient nature of work	No "employee engagement" policies
VULNERABLE POPULATIONS	Limited to no visibility of suppliers
Typically migrant or low-skilled workers	Payments required for work placements
Low entry barriers for the role	Accommodation provided
Roles are specifically gendered.	Relocation programs with worker charges

Risks in our Operations and Supply Chains

Our Suppliers and Supply Chain

Our suppliers are categorised into seven categories.

- Audit and Professional Services (10.3%)
- Cleaning and Office Supplies (5.15%)
- Entertainment (1.04%)
- IT & Communications (42.14%)
- Legal & Insurance (14.29%)
- Property and Rentals (12.72%)
- Regulatory Bodies (14.54%)

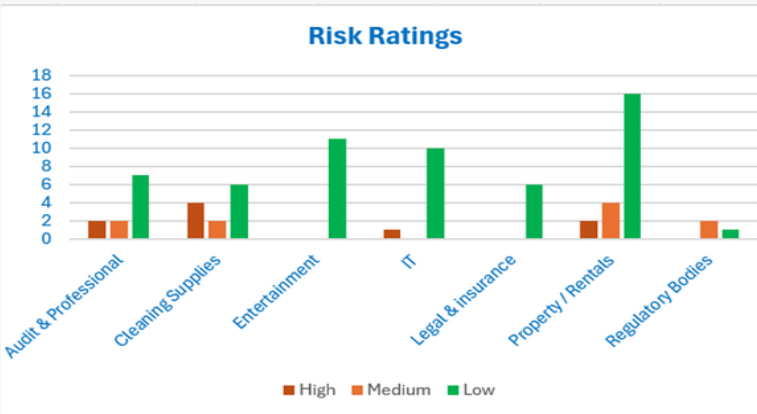
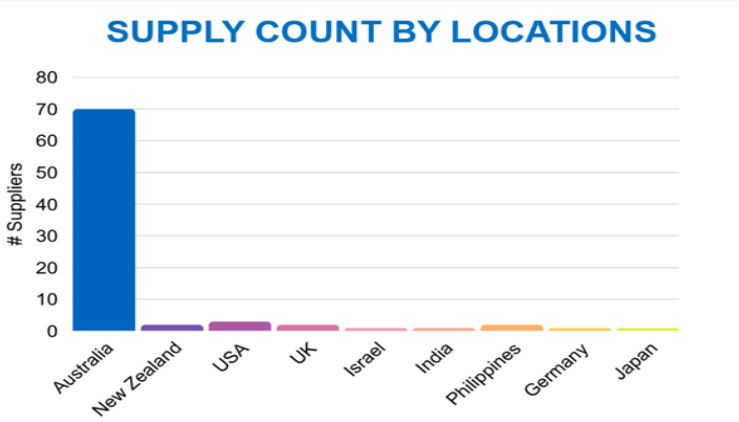


The majority of our suppliers are Australia based. 9 suppliers scored “High” in our Modern Slavery risk assessment, We confirmed (similar to previous years) that limitations in our survey style result in a higher risk rating where a business is not required to comply with the Modern Slavery Act (due to not meeting the threshold).

In these cases, we work with the supplier to ensure appropriate controls are in place to support their workers and to ensure the Fair Work Act (or local working law) entitlements are available to all workers.

This includes any of the following:

- copies of payslips and contracts of engagement
- site visits / evidence of employer supplied equipment
- employee surveys / site interviews
- statutory declarations



Supply Chain risk analysis

We have not identified any high-risk suppliers to date, where it was necessary to intervene or to make referrals to appropriate authorities to investigate.

Analysis of our supplies indicates that our highest spend category is IT and Communications related.

We also have significant spend in our Managed Services stream, with downstream suppliers of labour. For these arrangements, we apply our own internal controls onto the partner arrangements.

This includes:

- Employment agreements that comply with the FWA and NES
- Regular site visits and employee catch-ups
- Client site contracts that require health & safety and working conditions to comply with Australian legislation and our supplier standards
- Employee rate books – to ensure that workers in various roles are paid commensurate rates with as are articulated in the Modern Awards or Enterprise Agreements (depending on what is applicable)

SUMMARY OF IMPACT PATHWAYS ASSESSMENT (CSRD + AU MSA)	
RISK IMPACT RELATIONSHIP	POTENTIAL RISK FACTORS
CAUSE	Low risk in direct operations due to regulatory / internal controls, but inherent labor-intensive risks remain.
CONTRIBUTE	Managed Services arrangements where our influence intersects with third-party employment practices
DIRECTLY LINKED	Supplier and downstream labour relationships where adverse impacts may occur outside our direct control

Actions to Assess & Address Risks

Our Modern Slavery Framework (made up of the components below) summarises our ongoing actions to assess and address Modern Slavery Risks within our business.



Governance and Accountability

We maintain a strong governance framework to ensure modern slavery risks are identified, escalated, and managed/mitigated effectively across the organisation:

Sustainability Committee

Oversees our human rights commitments, including targets and KPIs related to modern slavery.

Compliance Committee

Has oversight of the Modern Slavery Framework.

Any confirmed instances of modern slavery must be escalated immediately for review.

Managing Directors & Heads of Departments

Accountable for embedding modern slavery awareness and controls into everyday operations and decision-making.

Board of Directors

Reviews and approves the annual Modern Slavery Statement and the commitments made within it.

This governance structure ensures accountability flows from frontline operations through to executive and Board oversight.



Supplier Onboarding & Contract Controls

We apply structured onboarding controls to ensure suppliers meet our expectations before engagement:

Mandatory Due Diligence

All new suppliers undergo a Modern Slavery Risk Assessment as part of procurement onboarding.

Supplier Development First Approach

- Our preference is to educate and support suppliers to build their own modern slavery frameworks.
- Where suppliers cannot meet minimum standards and risk-based exclusion criteria are triggered, we may discontinue engagement using our established remediation and exit processes.

Contract Safeguards

- All suppliers must sign our Supplier Code of Conduct.
- Contracts include a model Modern Slavery clause requiring:
 - Compliance with legislation
 - Notification of incidents
 - Remediation cooperation
 - Audit rights

These controls ensure clear expectations before any commercial relationship begins.



Supply Chain Assurance Approach

Our Supply Chain Assurance Program is designed to identify, assess, and manage modern slavery risks using a structured, risk-based methodology. This includes:

- Supplier risk profiling
- Risk indicators and scoring
- Assessment of risk severity and likelihood
- Recommended actions and controls based on risk level

We recognise the complexity of modern slavery and believe progress requires collaboration between business, suppliers, and government.

Our first step was creating a comprehensive inventory of all suppliers.

Each supplier is then assessed using key modern slavery risk indicators:

- Product and service category risks
- Vulnerable populations involved in production
- Geographical exposure to high-risk regions
- High-risk work practices

Where multiple high-risk indicators intersect, the likelihood of modern slavery increases and additional controls are required.



Risk-Based Audit & Remediation Program

Our audit program aligns assessment effort with risk:

Risk-Based Audit Cycle

Brands and departments manage their own suppliers and undertake additional reviews where elevated risk is identified.

Remediation Management

Where gaps are found, suppliers are required to complete corrective action plans. Progress is monitored until satisfactory closure.

This approach ensures audit and assurance resources are applied where most needed.



Training & Capability Building

We invest in awareness and capability across our workforce:

Mandatory Training

Delivered at induction and through annual compliance refresher programs.

Practical Guidance

Tools and resources support employees to identify indicators of modern slavery in operational contexts.

This ensures employees understand their role in identifying and escalating concerns.



Escalation & Incident Response

A clear escalation framework ensures rapid action where modern slavery risks or incidents are suspected:

- Internal Escalation
 - Brands and departments must escalate matters immediately to the Risk & Compliance team for investigation.
- Support Framework Includes:
 - Access to external specialists and NGOs
 - Pathways for victim support
 - Root cause analysis to prevent recurrence
 - Reporting to regulators where required

This allows us to manage potential incidents sensitively, lawfully, and effectively if required



Grievance & Whistleblowing Channels

To ensure safe and accessible reporting, we maintain:

- Anonymous reporting hotline available to supplier workers
- Multiple reporting channels, internal and external
- Clear prohibition of retaliation or disadvantage
- Tracking and review of all complaints
 - Including investigation outcomes and response actions

These mechanisms empower workers and reinforce our commitment to protecting human rights.



Continuous Monitoring & Data Analytics

Our monitoring program ensures risks are identified early and proactively managed:

- Monitoring of media, NGO reports, regulatory updates
- Trigger-based supplier reviews following significant events such as geopolitical instability, safety incidents, or sanctions changes

This helps ensure modern slavery risk assessment is dynamic—not a static, annual exercise.



Continuous Improvement

We conduct ongoing monitoring to ensure continued compliance, updating our program as new internal or external risks emerge.

Supplier risk scores are reviewed regularly to determine whether additional controls or assessments are required.

Key program health indicators (KPIs) include:

- Acknowledgement of our Supplier Code of Conduct
- Compliance with Modern Slavery commitments
- Supplier workforce satisfaction or well-being indicators (where available)

Actions Taken to Assess and Address Risks

During the most recent reporting period, we:

1. Increased visibility of supplier onboarding compliance, including:
 1. Monthly reporting on supplier's completion of our modern slavery risk assessment and
 2. Suppliers' acknowledgement of the Supplier Code of Conduct.
2. Introduced Monthly KPI reporting, across our sustainability commitments (including modern slavery risk assessments) with results now disclosed in Monthly Business Review Meetings with the CEO and CFO.
3. Completed a preliminary, high-level mapping of our modern slavery risk management approach against relevant components of the Corporate Sustainability Reporting Directive (CSRD), with a focus on human rights elements within ESRS S1.
4. Reviewed and made updates to our Modern Slavery Framework tools including policies, training, surveys, risk assessment criteria and new / emerging trends as part of our continuous improvement cycle. Including expansion of assessment criteria and answer methodology to improve accuracy of scoring.
5. The first annual RGF Staffing Sustainability Report was published during the reporting period. This outlines the groups sustainability strategy 'Creating opportunities for all'.
6. Affirmed our goal aligned with our Modern Slavery Framework:
By 2030, we aim to be a global leader in inclusive employment, offering meaningful, lasting work opportunities to individuals with a distance to the labour market, and embedding this principle across every part of our business.
7. Improved our Walk-Free Modern Slavery SAQ score to 83% (from 77%) with the updates we made, and the new tools we introduced as part of our Modern Slavery Framework review.
8. Introduction of an internal Human Rights Assessment (audit) which will continue into the next reporting period. It is likely this will become a periodic assessment, with frequency to be determined based on results.



RGF Staffing ANZ - Australia

Leading the way for women in the workplace

RGF Staffing ANZ has been recognized as one of WORK180's Top 101 Employers for Women in Australia, a distinction achieved by just 2% of over 5,000 companies. This recognition reflects our ongoing efforts to create an inclusive workplace for women and marginalized groups through progressive initiatives and policies.

In under a year, our endorsement score rose from 48% to 56%, showing measurable progress in advancing gender equality and raising our profile as a female-friendly employer. This milestone energizes our efforts to champion inclusion and ensure women continue to thrive at RGF Staffing ANZ.



“For your company to be in the top 2% of over 5,000 workplaces listed and ranked on the WORK180 platform is an incredible achievement that underscores your commitment to progress. You’re leading the way.”

WORK180

Actions to Assess & Address Risks

Another key focus area during the last reporting period was identifying indicators of Modern Slavery not only in, but also *outside* the workplace. By improving awareness of all types of indicators, we believe we can improve the identification of risks, which can then be assessed and addressed.

To support our expanded view of indicators of modern slavery, a number of new resources were released to the business including:

- **Vulnerable Worker Wellbeing Scripts** – designed for use with workers who come from vulnerable backgrounds. Our consultants can have confident conversations with workers, using questions that prompt open conversations about the workplace and outside, with supporting answer / action guides to follow for the next steps. The ultimate goal being to support individuals as best we can.
- **Housing Risk Identification Guide** – designed to use when discussing housing arrangements with migrant workers. This guide will help our consultants to have conversations that ensure our people are aware of supports in the community, not necessarily related to work, particularly for those who are new to Australia. We provide our consultants with additional points to discuss, that may help to identify where an individual may benefit from additional supports outside the workplace.
- **Community Support Guide** – a tool that our consultants can refer to in the event a worker may need assistance to connect with support agencies. Whilst these are not “work related” our belief is that we are part of our employee's community and making these introductions is a part of our role.

We also implemented an internal Human Rights Audit program during 2025, designed to assess operational compliance at the brand level, to our Modern Slavery Framework. This high-level audit is a tool that we will use in addition to the external reviews that we participate to improve our modern slavery framework.

Summary of our CSRD & MSA Mapping

Our exploratory mapping, to understand alignment between CSRD expectations and our obligations under the Australian Modern Slavery Act, will be used to inform future improvements. To date we consider the following, resulting from this analysis:



1. Our Direct Operations - Risk of Causing impacts

Our direct operations include recruitment, labour hire, workforce management and professional services. Workers engaged directly by us are employed under Australian and New Zealand workplace laws and subject to internal policies and controls, including payroll, workplace health and safety, and employee relations processes. We assessed the risk of causing severe adverse human rights impacts, (forced labour or labour exploitation), within our direct operations remains **low**, due to:

- strong regulatory oversight of employment practices in the jurisdictions we operate;
- direct control over employment terms, remuneration, and conditions; and
- established internal grievance and whistleblower mechanisms.

We acknowledge that labour-intensive business models inherently carry risks such as excessive working hours, wage underpayment, or unfair treatment if controls fail, and therefore we continue to monitor and manage these risks.



2. Our Client Contracts / Managed Services - Risk of Contributing to impacts

Our brands enter client contracts that may include Managed Services arrangements (i.e., downstream labour). In these circumstances, We do not directly employ the workers but may influence workforce outcomes through:

- the worker onboarding processes;
- contract management requirements;
- rate books that detail appropriate pay rates based on Modern Awards and Enterprise Agreements (as appropriate)
- performance monitoring and operational oversight.

The potential risk that we could contribute to adverse human rights impacts exists if:

- third-party suppliers fail to meet fair labour standards;
- commercial pressures contribute to excessive working hours, wage suppression, or insecure employment; or
- inadequate oversight results in worker vulnerability or exploitation.

We recognise that our Brand's role in Managed Services arrangements requires particular attention to due diligence, contractual expectations, and escalation pathways to avoid contributing to labour exploitation by third-party providers



3. Our Supplier / Business Relationships Risk of Direct Links to Impacts

Our broader supplier base includes providers of information technology services, business support services, cleaning and office supplies as well as property services, some of which involve labour-intensive activities and in some cases, on-call labour models.

In these relationships, we may be directly linked to adverse human rights impacts where:

- suppliers engage practices inconsistent with human rights or labour standards;
- workers are engaged through complex or opaque labour arrangements; or
- suppliers operate in environments with weaker employment protections or heightened vulnerability risks.

While we may not cause or contribute to such impacts, our business relationships can create linkage risks where adverse impacts occur in the value chain connected to services provided to us or our clients. We therefore require our suppliers to participate in our Supplier Due Diligence processes and our Modern Slavery Assessment.



4. Downstream Labour Risks in Client Value Chains

We also recognise that through our role supporting clients', we may be inadvertently connected to downstream labour risks through client value chains.

Because we have limited visibility of client supply chains, and because we are treated as the "Supplier" in these arrangements, it is difficult for us to take a position of instruction. We therefore consider client arrangements to be an area for ongoing consideration and improvement.

Effectiveness of Actions and Consultation

Assessing the effectiveness of our actions

We assess the effectiveness of our Modern Slavery program and actions through:

- Completion and review of our supplier risk assessment results (trends, types etc)
- Monitoring of survey results, risk assessments, incidents, complaints and grievances
- Feedback from employees, contractors and clients
- Internal reporting through sustainability and executive governance forums
- Internal feedback about our processes and tools

Internal feedback again, focused on the suitability of our Modern Slavery Risk assessment, particularly for smaller suppliers who do not meet the reporting criteria threshold and who are unlikely to have the more mature processes and frameworks that our survey favoured. To support this feedback, we introduced a simplified process involving evidence and statutory declarations that may be used on a case-by-case basis.

After implementing these changes, we did see a reduction in the number of high-risk suppliers being recorded and a higher willingness for smaller suppliers to participate in our processes and to sign our supplier code of conduct.

During the reporting period, no substantiated instances of modern slavery were identified within RGF ANZ's operations or direct supply chains. We had one instance where an individual utilised our reporting channels to seek assistance for their personal circumstances. We took steps to connect the individual with support services and agencies, who were able to provide assistance to the individual. We ensured continuity of employment during this time and provided flexibility to support the individual as they needed.

External audits support our internal framework / program reviews and our continuous improvement cycle. These reviews include:

- EcoVadis score card reviews
- SEDEX supplier audits
- Various client reviews (ad-hoc)
- Work180 reviews



Consultation with our Brands and Headquarters

RGF Staffing ANZ is a collection of brands who operate independently, within an overarching corporate governance structure. This Statement was prepared in consultation with all brands (entities):

- ahs Hospitality Pty Ltd
- Aurion Corporation
- Chandler Macleod Group
- Peoplebank Australia
- Vivir Healthcare
- RGF Staffing Headquarters (specifically the global sustainability team)
- RGF ANZ Executive Management
- Internal subject matter experts across risk, people and operations

Consultation was conducted with all brands through the circulation of materials, targeted information requests and management reviews. This ensures the Statement accurately reflects the operations and supply chains of each brand and aligns with the RGF Sustainability strategy.

Within each brand, Modern Slavery representatives have been appointed. These representatives participate in a two-way exchange of information with our Sustainability and Risk team throughout the year on both a formal and in-formal basis. This ensures we maintain an open and collaborative approach to managing our Modern Slavery Framework.

This annual statement, and all included details, was endorsed by our [Executive and Group Leadership Team](#) (including representation from all our controlled entities).

RGF Staffing ANZ and its controlled entities, share common Directors including the Chief Executive Officer and Chief Financial Officer, who keep the Board informed of the Modern Slavery reporting requirements and our progress against the related commitments made.



Continuous Improvement and Goals

Commitment to continuous improvement

RGF Staffing ANZ remains committed to continuous improvement in identifying, preventing and addressing modern slavery risks within our operations, supply chain and the community.

Our approach to continuous improvement includes:

- the regular review of relevant policies and standards,
- periodic internal human rights reviews, and
- monitoring of reported incidents and concerns to identify emerging risks and opportunities to strengthen controls.

We continue to work closely with RGF Staffing Headquarters and regional colleagues to strengthen governance, align with emerging global standards and enhance transparency over time.

We discuss throughout this report, our continuous improvements achieved over the last reporting period including:

- Review / Update of our Modern Slavery Survey and improved scoring methodology
- Review / update of our Modern Slavery Framework Tools
- New Supplier Code of Conduct rolled out
- Supplier Actions tracker - Closing the Gaps tool published



Forward looking goals

Our goals for the period ahead include:

- Maintain SEDEX Membership for the Chandler Macleod brand, and Platinum EcoVadis rating across the group.
- Formalise and increase discussion on the topic of Modern Slavery to twice per annum, by embedding it as one of the sustainability topics of the Group Leadership Team meeting agenda.
- Work with brands to consolidate/reduce the number of suppliers where possible



Opportunities for Life. Faster, simpler and closer to you.

RGF Staffing is constantly seeking to bring 'Opportunities for Life', by connecting individuals and businesses, and offering both a multitude of choices.

Approval by the Principal Governing Body

This Statement was approved by the Board of Directors of RGF Staffing, in their capacity as the principal governing body of RGF Staffing ANZ Pty Ltd on 1st June 2026 and is signed on behalf of the Company and its controlled entities by Brent Leahy, Director and Chief Executive Officer. / Responsible Officer.
This Modern Slavery Statement was approved by the Board of RGF Staffing ANZ Pty Ltd in accordance with section 13(2) of the Modern Slavery Act 2018 (Cth).



Brent Leahy

Director/Chief Executive Officer
RGF Staffing ANZ

A handwritten signature in black ink, appearing to read 'Brent Leahy', written over a horizontal line.



