



Michael Page International (Australia) Pty Ltd
Modern Slavery Statement





Modern Slavery Statement

Michael Page International (Australia) Pty Ltd's purpose is to change lives through creating opportunity for people to reach their potential. We are therefore fully committed to preventing acts of modern slavery and human trafficking from occurring within the business and the supply chain.

Our Employee and Supplier Code of Conduct makes it clear that we expect our own people and everyone employed by our suppliers, whether permanent or temporary, to be treated with respect and dignity at work and we believe employment should always be chosen. There must be no forced, bonded or involuntary labour. Employees must not be required to lodge monies or identity papers to be able to work and must be free to leave employment after the giving of reasonable notice.

We are publishing this statement to explain the work we have completed to date to combat modern slavery within our business and the steps we intend to take over the coming year.

MICHAEL PAGE INTERNATIONAL (AUSTRALIA) PTY LTD



Background

Modern slavery is a global issue which can affect any business in any sector and is often very difficult to detect. We recognise and take very seriously the risk of modern slavery in our business and our people and we are committed to taking steps to reduce this risk within our business and supply chain.

Michael Page International (Australia) Pty Ltd

Michael Page International (Australia) Pty Ltd ABN 58 002 872 264 is a company that specialises in recruitment consultancy in Australia (“the Company”/“we”). PageGroup plc is the ultimate holding entity of the Company, and the PageGroup group of companies’ trades under the core brands of PAGEGROUP, PAGE EXECUTIVE, MICHAEL PAGE, PAGE PERSONNEL and PAGE OUTSOURCING.

The Company has approximately 300 employees in Australia, with annual revenue of approximately \$100 million.



Our Supply Chain

As an Australian provider of recruitment services, we consider our supply chain to be relatively simple in comparison to many other industries.

We work on a short and long-term basis with a small range of suppliers who provide goods and services across a number of different categories.

Our supply chain includes the services provided to the Company directly by supply of goods, facilities services and professional services. For example, for facilities services, we engage various Australian-based providers to provide cleaning, waste management and maintenance services to our Australian offices. Labour is sourced in Australia. Products used may be sourced both in Australia and overseas. It is possible that some of the products or components of the products sourced by our suppliers may be sourced from countries where there is some risk being linked with modern slavery.

In preparing this statement, the Company took into consideration factors that have the potential to cause or contribute to modern slavery practices across various sectors, industry types of products and services, location and business models. We also identified areas in our supply chain where there is a risk that a local or overseas supplier may source products or services from entities linked to modern slavery practices. The Company has identified that there is a low risk of causing or contributing to modern slavery in its operations and supply chains. This is because, as a professional services company based in Australia, we are not directly involved in overseas labour or manufacturing.

However, like many professional services companies, the Company has identified there may be some risk of being directly linked to modern slavery, as our suppliers may source products, services or raw materials from overseas companies that may be connected with modern slavery.

We conduct risk assessments on our supply chains on an ongoing basis and at this time we consider that there is a relatively low risk of labour exploitation or other forms of modern slavery and human trafficking occurring within it. Nevertheless, we are assessing and addressing the risk of modern slavery practices occurring within both our business and our supply chain by taking the following actions:

- conducting due diligence on third party service providers;
- evaluating the modern slavery risks of each new supplier;
- partnering with suppliers that share our view and stance on modern slavery; and
- building long-standing relationship with suppliers who are aware of our stance and expectations of business partners.

We will, in conjunction with our global management teams, seek to identify further risks of indirect human trafficking operations within our supply chains.



Our Policy on Modern Slavery and Human Trafficking

Our employees are required to comply with our Employee Code of Conduct.

Our suppliers are required to comply with our Supplier Code of Conduct.

These policies reflect the Company's commitment to acting ethically and with integrity in our business dealings and relationships. They also reflect an effort to implement and enforce effective systems and controls to ensure modern slavery and human trafficking is not taking place within our business and supply chain.

In addition to these policies, we also have the following policies in place to assist with the prevention of modern slavery and human trafficking:

- Speak Up (Whistleblowing) Policy; and
- Code of Conduct.



Due Diligence and Assessment Processes

Our Own Business

The Company prohibits the use of all forms of forced labour and any form of human trafficking as set out in the Employee Code of Conduct. We have a number of procedures in place in relation to our employees to proactively manage any risk, including robust recruitment processes in line with Australian employment laws and an external confidential whistleblowing helpline which employees are encouraged to use to report any concerns.

As part of our own business, we have direct control over the sourcing and supplying of temporary personnel to a number of clients within Australia. We take our obligations seriously in this respect and have implemented a system of checks and audited procedures carried out by our employees to ensure that those temporary workers are protected from the risks of modern slavery including:

- checking that temporary workers have a right to work in Australia for the duration of their assignment. This involves asking the individual to produce relevant identity documentation. A delay in providing proof of identity and/or associated right to work documentation might indicate a modern slavery issue and would be escalated appropriately;
- taking relevant references to ensure individuals are hired in a role that they have both the qualifications and experience to undertake;
- carrying out detailed background checks;
- ensuring all contracts comply with all legal requirements regarding workers' rights;
- checking that temporary personnel have a bank account in their own name into which their remuneration is paid in circumstances where we provide payroll services as required by our clients; and
- receiving pay in accordance with applicable legislation and industrial instruments including the Fair Work Act 2009 (Cth).

In addition, our employees, through the Employee Code of Conduct, are made aware of our requirement for them to support and uphold human rights principles and know that the Company will not tolerate, engage in or support the use of forced labour.

Due Diligence and Assessment Processes

Our Supply Chain

As part of our global initiative to identify, monitor and reduce the risk of modern slavery and human trafficking occurring within our supply chain, we are undertaking the following due diligence procedures: -

- a. mapping our suppliers who provide goods and services to our business to identify those suppliers whose goods and services are dependent on the provision of people; and
- b. commencing to assess those suppliers within Australia, Asia Pacific and the UK (which has already been completed), who we believe are in the high risk area and writing to each supplier to note our commitment to transparency and combatting modern slavery within our business and ensuring they understand we have a similar expectation from suppliers of goods and services to us. We are sending these suppliers the Company's Code of Conduct and requesting a signed confirmation from those suppliers that they have adhere to our required standards.

This approach is designed to:

- identify and assess potential risk areas in our supply chain;
- mitigate the risk of slavery and human trafficking occurring in the supply chain; and
- monitor potential risk areas in the supply chain.



Risk and Compliance

The Company has evaluated the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain through a combination of internal audit and our local procurement teams. This ensures that our organisation has robust and effective processes. As our core business is focused on the provision of recruitment services in respect of professionals, office and administrative workers (rather than in relation to agriculture, retail or manufacturing, which are sectors we perceive to present a higher risk of labour exploitation and modern slavery), we do not consider that we operate in a particularly high risk sector. This evaluation process will continue on an annual basis.



Further Steps

Over the next year, our key focus is to prevent modern slavery or human trafficking occurring in our business and supply chain and to measure the effectiveness of the actions we have taken. We intend to take the following steps in relation to modern slavery and human trafficking during the course of the 2021 reporting period:

- to complete the mapping of our suppliers;
- include appropriate anti-modern slavery terms in our agreements with suppliers;
- continue to raise awareness with our key teams through providing training to ensure a high level of understanding of the risks of modern slavery, so they are aware of what to look out for in respect of modern slavery;
- identify how best to map the supply chains of our overseas businesses; and
- implement a formal remediation process.

This statement is made pursuant to section 16 of the Modern Slavery Act 2018 (Cth) and has been reviewed and approved by the Board of the Company on 11 June 2021.

MICHAEL PAGE INTERNATIONAL (AUSTRALIA) PTY LTD

Sharmini Wainwright
Senior Managing Director
Date: 16 June 2021

David George
Managing Director
Date: 16 June 2021