

MODERN SLAVERY STATEMENT 2021

ABOUT SEEK

Acknowledgement of Country

SEEK respectfully acknowledges the Traditional Owners of the land on which it operates.

We acknowledge Aboriginal and Torres Strait Islander peoples as Australia's First Peoples, paying respects to their rich cultures, to their Elders past, present and future, and their continuing custodianship of the land, waterways and community on which we all rely. We extend that respect to all Aboriginal and Torres Strait Islander peoples.

We recognise and value the ongoing contribution of Aboriginal and Torres Strait Islander people and communities to Australian life and how this enriches us.

SEEK's purpose is to help people live more fulfilling and productive working lives and help organisations succeed.

Main activities:

- online matching of hirers and candidates with career opportunities and other related services
- investing in early stage businesses and technologies that complement SEEK's employment marketplaces
- distribution and provision of higher education courses

*A description of SEEK's controlled entities is in note 19 to the Financial Report in SEEK's 2021 Annual Report available on the company website <https://www.seek.com.au/about>

Structure and operations



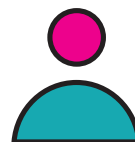
SEEK employs 1,000+ people in Australia and 2,000+ around the world



Australian public company listed on the Australian Securities Exchange (ASX:SEK)



Headquartered in Melbourne with subsidiaries operating in Australia, New Zealand, Hong Kong, South-East Asia, Brazil & Mexico

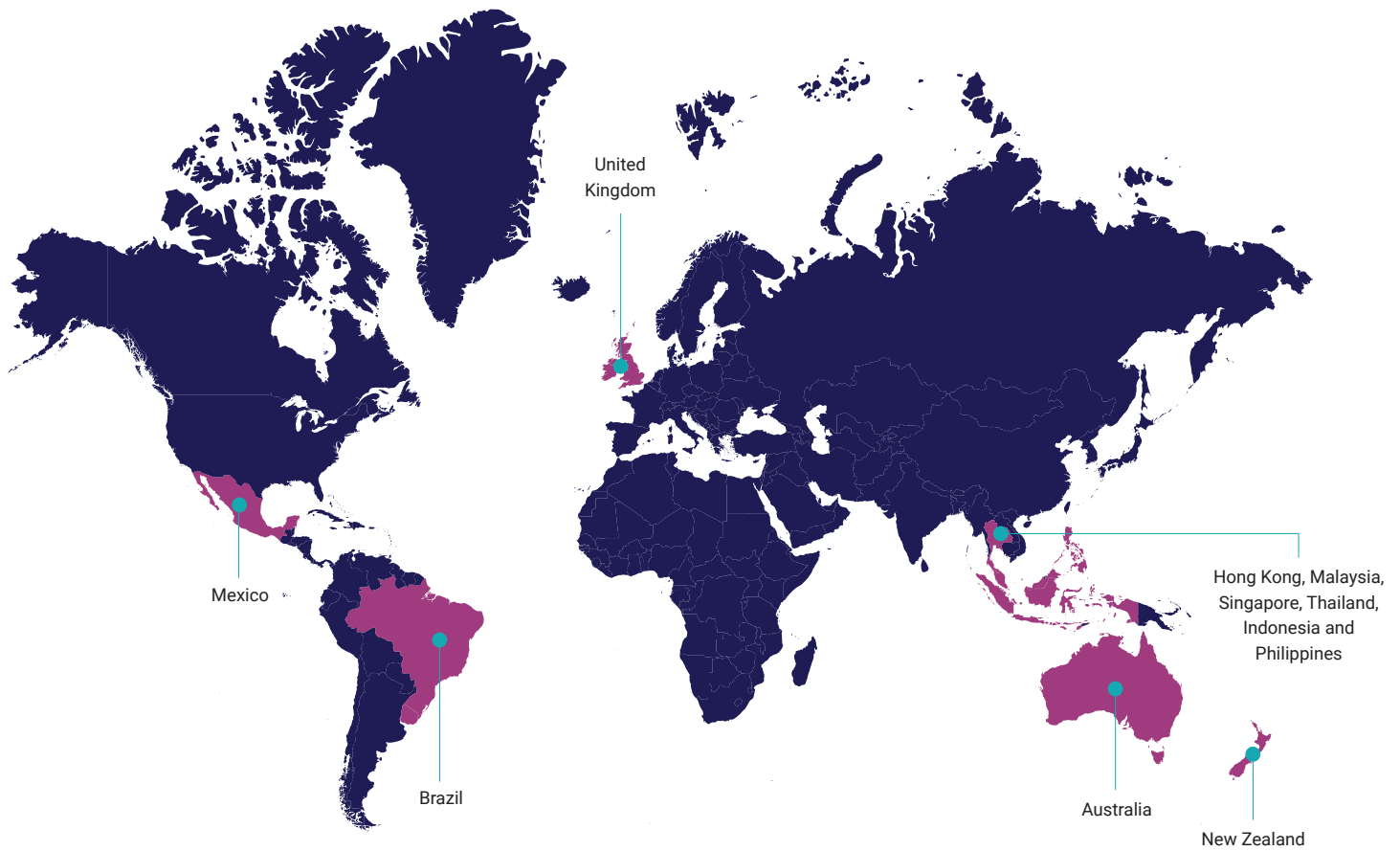


OES employs 480+ people, mostly in Australia, and engages 750+ part time sessional academic tutors



OES provides online higher education courses and services to students in partnership with six universities in Australia and the United Kingdom. OES delivers online program management and content services to partners in Australia, USA, New Zealand, United Kingdom and mainland Europe

SEEK OPERATIONS



Geographical coverage represents the countries of operation of SEEK's employment platforms and OES.

SEEK



SEEK Growth Fund



INTRODUCTION

SEEK is opposed to slavery in all forms and has taken significant steps to identify and address any links between SEEK's operations and supply chains and modern slavery.

The nature and extent of modern slavery means no company is immune from this risk. SEEK acknowledges its role and responsibility to safeguard against the risk of modern slavery in advertising job opportunities which could involve deceptive recruiting for forced or bonded labour, including human trafficking. During FY2021 SEEK's ongoing due diligence program has examined this risk in relation to SEEK's employment platforms JobStreet in Indonesia and JobsDB in Thailand.

SEEK's supply chains are complex with dynamic networks spanning 35 countries and comprising more than 2,000 direct suppliers. SEEK is committed to maintaining and improving systems and processes to identify and prevent modern slavery within these supply chains. SEEK works in collaboration with suppliers to develop and deliver effective systems and processes to prevent and address modern slavery risks.

Combatting modern slavery is an area for continuous improvement. SEEK embraces the opportunity to safeguard human rights in its supply chains and in operating its employment platforms.

Progress since 2020

SEEK has built on its foundational work to address modern slavery risks described in its first Modern Slavery Statement in 2020. This 2021 Modern Slavery Statement presents the further work undertaken and more detailed disclosures including:

- Expanded information on SEEK's supply chains, incorporating SEEK's Asian and Latin American operations.
- Case studies detailing SEEK's work with suppliers to address modern slavery risk.
- Description of the due diligence processes to assess modern slavery risks for candidates across employment platforms, particularly in SEEK Asia.
- More granular detail about the composition of SEEK's workforce to underpin the analysis of operational risks.
- Greater detail about the ways SEEK's subsidiaries were consulted about modern slavery risks.
- Additional explanation as to how modern slavery safeguards are integrated into SEEK's governance processes, including how responsibility for modern slavery risk is assigned within the business.

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For more information about SEEK

- See how SEEK delivers on its Purpose through its values-based culture in the Sustainability Report.
- Read more about SEEK's strategy and comprehensive information on SEEK's activities and financial performance for FY2021 in the Annual Report.
- The Corporate Governance Statement describes SEEK's corporate governance practices and approach to responsible and ethical behaviour.

SEEK's reports can be accessed at <https://www.seek.com.au/about/> in the "Investors" section.

About this Statement

This Modern Slavery Statement (**Statement**) has been prepared in line with the requirements of the Australian Modern Slavery Act 2018 (Cth) (**Act**).

SEEK Limited (**SEEK**) qualifies as a reporting entity under the Act. Online Education Services Pty Limited (**OES**), which was during FY2021 a controlled entity of SEEK, also qualifies as a reporting entity under the Act. This Statement is a joint statement by the submitting entity SEEK (ABN 46 080 075 314). SEEK is listed on the Australian Securities Exchange and headquartered in Melbourne at its registered office at 60 Cremorne Street, Cremorne Victoria 3121 Australia.

OES (ABN 75 148 177 959) is a company incorporated in Australia. During FY2021 shares in OES were held by a wholly owned subsidiary of SEEK (80%) and by Swinburne University of Technology (20%). Its registered office and principal place of business is Level 6, 600 St Kilda Road, Melbourne Victoria 3004 Australia.

This Statement covers the reporting entities SEEK and OES for the financial year ended 30 June 2021 (**FY2021**). This Statement does not cover non-controlled entities or non-operated joint venture operations.

About SEEK's structure and operations

SEEK provides online matching of hirers and candidates with career opportunities and other related services via websites and apps referred to as employment platforms. This activity focuses on innovative products, data and technology, employing a professional, office-based workforce across Australia, New Zealand, South-East Asia, Hong Kong (and a small support office in China), Mexico and Brazil.

SEEK operates employment platforms under the following brands:

Australia: SEEK, SEEK Business, SEEK Learning, SEEK Volunteer, CERTSY

New Zealand: SEEK, SEEK Volunteer

Malaysia: JobStreet

Indonesia: JobStreet

Singapore: JobStreet

Philippines: JobStreet; WorkAbroad; SeamanJobsite

Thailand: JobsDB

Hong Kong: JobsDB

Brazil: Catho

Mexico: OCC Mundial

Jora is located within the SEEK business in Australia and operates a career platform with a presence in 36 countries. Jora sources career opportunities from many job sites, referred to as 'ad aggregation'.

SEEK has three controlled entities that operate as separate businesses: OES, SideKicker and JobAdder.

The operations and supply chains of OES are described on page 5.

Sidekicker is an on-demand staffing platform that provides contingent labour for hospitality, events, business support and other industries in Australia and New Zealand. Sidekicker is based in Australia and employs approximately 100 professional and administrative office-based employees. In addition, approximately 15,000 staff are pre-vetted and employed by Sidekicker and placed as casual and temporary workforce. The Sidekicker platform services contingent labour markets in several industries, including events and hospitality. Sidekicker is the "employer of record" for the contingent workers, retaining responsibility for ensuring wage compliance, including applicable wage rates, and payment of superannuation and tax. This ensures staff are paid in accordance with all appropriate awards or EBAs.

JobAdder is a talent acquisition software suite that simplifies the hiring process for recruiter and corporate talent acquisition teams. JobAdder is headquartered in Australia with a presence in New Zealand, United Kingdom, the United States and Canada. JobAdder employs approximately 150 professional and administrative office-based employees, mostly in Australia.

A description of the SEEK controlled entities is in note 19 to the Financial Report in SEEK's 2021 Annual Report available on the company website seek.com.au/about

Since 2018, SEEK has been structured into two main divisions, Asia Pacific and Americas (**AP&A**) and SEEK Investments. Under this structure, AP&A has focussed on operating online employment marketplaces. SEEK Investments has focussed on investing and scaling early stage ventures (**ESVs**) across the themes of online education, contingent labour and human resources software as a service (HR SaaS).

In August 2021 SEEK announced the completion of its strategic review of options aimed at providing a greater degree of independence and focus for SEEK's AP&A and SEEK Investments businesses. The review concluded that a structural separation of SEEK Investments, through the creation of a new unit trust, referred to as the 'SEEK Growth Fund' (**Fund**) was in the best interests of all SEEK investors. SEEK has transferred its holdings in OES and is transferring 14 ESVs (including SideKicker) to the Fund as seed assets, being the majority of SEEK's existing ESV portfolio, together with new capital. The Fund is managed by SEEK Investments, an independent management company which will also manage certain SEEK retained assets including Zhaopin (23.5% interest) and JobAdder. Once all of the seed assets are transferred to the Fund and capital is fully drawn down, SEEK is expected to own c.84.5% of the economic interest in the Fund.

The reduction of SEEK's interests in Zhaopin during the year and the creation of the Fund will enable a greater focus for SEEK on the growth opportunities within its core online employment businesses. SEEK will comprise the core AP&A businesses operating the online employment marketplaces in Australia and New Zealand, Hong Kong, South-East Asia, Brazil and Mexico, and certain portfolio investments, primarily Zhaopin.

SEEK is implementing a new corporate structure to enable greater focus on the growth opportunities within its core online employment businesses.



Reporting boundary

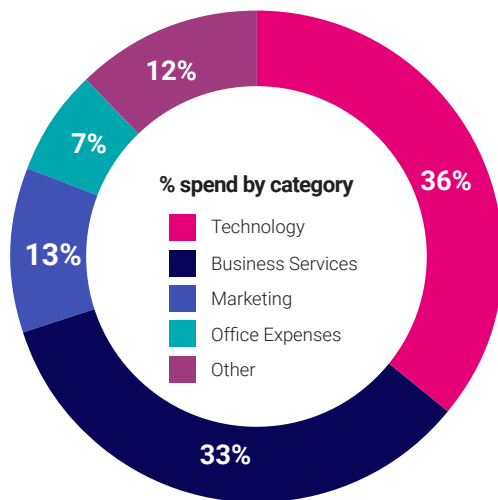
This Statement focuses on the operation of SEEK's online employment platforms in Australia, New Zealand, South-East Asia, Hong Kong, Brazil and Mexico, as well as OES.

About SEEK's supply chains

Categories of spend

During FY2021 SEEK's total value of spend was close to \$190 million comprising 2,227 suppliers. Unless stated otherwise, suppliers refers to tier 1 suppliers directly engaged by SEEK.

As a technology business, SEEK's primary categories of spend are technology, business services, marketing and office expenses. These represent over 89% of SEEK's annual spend and over 65% of SEEK's suppliers.

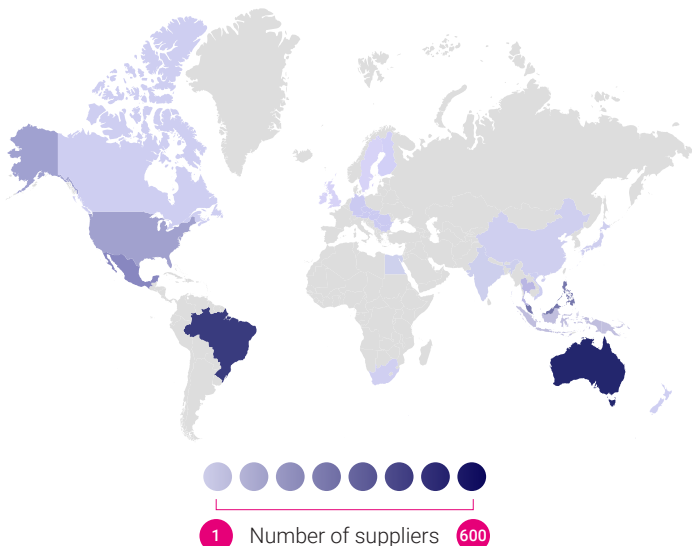


The Melbourne headquarters of SEEK relocated to a purpose-built office in the Melbourne suburb of Cremorne in August 2021. In FY2021 SEEK engaged suppliers relating to the fit-out of its new Melbourne headquarters as well as offices in Sydney and Auckland. The office fit-outs during FY2021 accounted for 25% of SEEK's annual supplier spend. This expenditure is not represented here.

Location of suppliers

SEEK has offices located in Australia, New Zealand, South-East Asia, Hong Kong (and a small support office in China), Mexico and Brazil.

The majority of SEEK's suppliers are in Australia, Brazil, Mexico and Malaysia.



About OES's structure, operations and supply chains

OES's structure and operations are low risk for modern slavery. OES's main activity is the distribution and provision of online higher education courses. It operates principally in Australia with smaller offices in the United Kingdom. OES directly employs professional staff for office-based management and administration roles and engages sessional tutors for online teaching. Employees and sessional staff are mainly located in Australia with some in the United Kingdom, both countries with low inherent modern slavery risk.

OES is operated as a standalone business with its own corporate policies and operational and governance practices. OES has therefore conducted its own modern slavery risk assessment and remediation process.

During FY2021, OES conducted an annual inherent risk analysis of its top 100 suppliers. The analysis was based upon (i) country of supply, (ii) supplier industry and (iii) type of good or service provided by that supplier.

The analysis identified two suppliers as having elevated risk of modern slavery within its supply chains: OES's office cleaning service and a computer supplier.

Cleaning services have an elevated risk of modern slavery as there is limited transparency within the cleaning industry. This can result in employers taking advantage of workers, including withholding wages and providing dangerous or sub-standard working conditions.

During FY2021, OES engaged a cleaning supplier to service its office. OES's office was closed for much of the year due to COVID-19 restrictions and cleaning services were limited. OES is leaving its current office in FY2022 and co-locating with SEEK at its headquarters in Cremorne, where OES will share SEEK's cleaning services. SEEK has already worked with this supplier to mitigate its modern slavery risk as described on page 14.

The computer supplies purchased in Australia are sourced from overseas markets where there is less visibility and therefore a higher risk of modern slavery in the secondary levels of the supply chain. This risk is with tier 2 and 3 suppliers that manufacture the computers and components and source raw materials. OES is currently focussed on identifying and addressing risk in tier 1 suppliers and will work to address these secondary supply chain risks in the future.

During FY2021 OES acquired a 58.6% interest in Proversity.org Limited (UK) trading as Construct Education which produces digital content for higher education. Construct Education directly employs 160 people in office-based roles in South Africa, the United Kingdom and the United States. OES will integrate Construct Education in its modern slavery risk assessments going forward.

Governance of SEEK's Modern Slavery Program

SEEK takes a company-wide approach to modern slavery risk. The Modern Slavery Program of risk assessment, remediation and associated training is planned on a three-year rolling basis in consultation with senior management of SEEK ANZ, SEEK Asia, OES and other businesses. The Board of SEEK receives reports on the Modern Slavery Program and approves this Statement. The Audit and Risk Management Committee of the Board oversees the process to verify the integrity of this Statement.

The Chief Financial Officer of SEEK is accountable for modern slavery reporting, which is the responsibility of the Governance team.

SEEK takes a centralised approach to assessing and addressing modern slavery risk across all its employment platforms. The intent is to prioritise higher risks and develop knowledge and expertise as the program evolves. Due diligence is performed by specialists in the Risk & Assurance and Governance teams. The SEEK Risk Management Framework is applied to the risk assessment and recording of modern slavery risk and remediation. For each due diligence exercise, clear actions, accountabilities and timeframes apply. Measures to address the risks of modern slavery are managed locally, supported by relevant policies.

The Fair Hiring Initiative is described on page 12 and is led by SEEK's Chief Executive Officer. SEEK Asia's Chief Executive Officer and other managers are involved in regular steering meetings as part of this initiative.

A Supply Chain Integrity Manager is responsible for coordinating the modern slavery supply chain activities for all AP&A businesses. SEEK uses a due diligence framework, combining data analytics and manual risk analysis activities, to assess modern slavery risk within the global supply chain. SEEK works directly with suppliers with elevated modern slavery risk to remediate these risks, as described on page 13.

Modern slavery aware culture at SEEK



Awareness

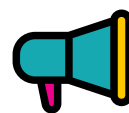
SEEK continues to build an understanding of the extent of modern slavery and the possibility that SEEK may be linked to or contributing to modern slavery.

During FY2021, targeted briefings were delivered within SEEK to build awareness of modern slavery and the Modern Slavery Program. Executive, Procurement, Human Resources, Marketing and Information Technology teams in Latin America received training about modern slavery, high risk industries for SEEK and SEEK's actions to address modern slavery in the supply chain.



Diligence

SEEK actively promotes ethical and responsible business practices. A robust recruitment process includes probity and 'right to work' checks for prospective employees. Expected workplace behaviours are covered in induction activities for new employees, during which they learn about SEEK's culture. To further build understanding of the expected behaviours, employees are required to complete mandatory online training modules on Anti-Bribery and Anti-Corruption, Equal Employment Opportunity and Workplace Health and Safety. The Code of Conduct together with the SEEK Group Anti-Bribery and Anti-Corruption Policy set out the expectations for the way to work, including a zero-tolerance approach to bribery and corruption. These are available on SEEK's company website and to employees via SEEK's intranet.



Reporting

The SEEK Group Whistleblower Protection Policy encourages reporting and outlines what protections a person who reports a wrongdoing will receive.

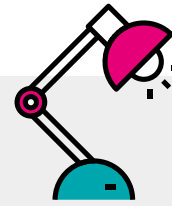
Whistleblower channels provide a safe way for SEEK's employees, suppliers and contractors to raise concerns about improper conduct at SEEK, including conduct relating to modern slavery.

Modern slavery risk



Employment platforms

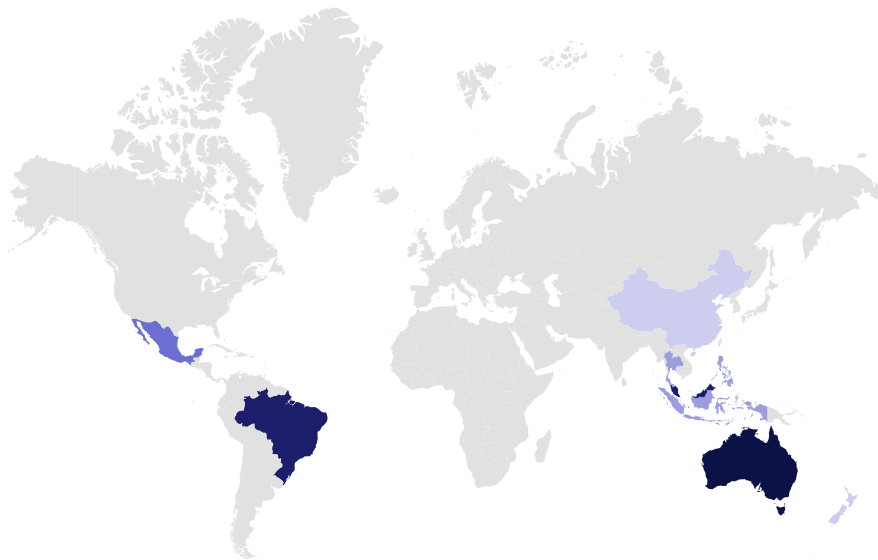
SEEK operates online employment platforms that advertise jobs and match hirers and candidates with career opportunities. Jobs advertised on SEEK's employment platforms are placed directly by hirers who also perform the recruitment process. This gives rise to the risk of SEEK being linked to modern slavery by enabling the advertising of job opportunities that could result in forced labour, trafficking or debt bondage.



Office operations

The risk that SEEK's operations directly result in modern slavery practices is extremely low due to the specific composition and location of the workforce. People who work for SEEK are employed directly and predominantly on permanent contracts in skilled office-based roles for which SEEK performs its own recruitment. During COVID-19 closures in FY2021, consistent with SEEK's commitment to long-term business goals, there were no redundancy programs and no reductions were made to salaries or working hours for permanent staff.

SEEK's operational profile : Direct employment by country



Australia	1,100
Brazil	720
Malaysia	490
Mexico	310
Philippines	170
Indonesia	160
Hong Kong	150
Thailand	86
Singapore	31
New Zealand	28
China	24

As at 30 June 2021. Excludes OES, Sidekicker and JobAdder which are operated as independent businesses.

Operational risk could be present in areas of the business that use contracted or third-party office service providers such as cleaning. SEEK has less direct visibility and control over these workers and their employment terms. These workers could be recent migrants, international students, or other vulnerable groups, who may be less aware of their rights and, consequently, susceptible to exploitation. This risk is addressed as part of supply chain risk.

Supply chain



Suppliers engaged by SEEK ANZ, SEEK Asia, Catho and OCC during FY2021

Total number of suppliers:	2,227
Suppliers that underwent modern slavery inherent risk analysis:	1,205
Suppliers rated as having elevated risk of modern slavery following inherent risk analysis:	127
Suppliers that underwent modern slavery risk assessment:	53
Number of reported or identified instances of modern slavery in SEEK's supply chain:	0

Technology, marketing and business services make up 82% of SEEK's supply chain spend. Suppliers within these categories of spend have a low inherent risk of modern slavery and tend to have relatively well-advanced controls. As a result, the majority of SEEK's direct supply chain has a low inherent risk of modern slavery.

Seven percent of SEEK's supply chain relates to office expenses, with the majority of SEEK's suppliers in this category of spend found to have low inherent risk for modern slavery. Some suppliers, such as cleaning services and security, have been identified as having elevated risk due to these industries being associated with labour exploitation. SEEK has taken steps to further assess and address the risks associated with these suppliers. This is discussed on page 13.

SEEK recognises that modern slavery risks may exist in the secondary levels of the supply chain, as a result of suppliers engaged within the supply chains of SEEK's direct suppliers. For example, the direct supply of cloud services to SEEK may have a low inherent risk of modern slavery. However, the tier 2 and 3 suppliers engaged to provide the components, hardware and peripheral services necessary to deliver the cloud services may have higher levels of risk.

SEEK is currently focussed on understanding the modern slavery risks associated with its direct suppliers. Over the next 18 months SEEK will commence reviewing tier 2 suppliers in high-risk categories of spend. Progress will be reported in SEEK's FY2022 Modern Slavery Statement.

Primary Spend Category	Purpose of spend	Sub-category	Modern slavery risk
Technology	SEEK relies on a diverse technology supply chain to develop, maintain and deliver products and services to customers and employees in a way that promotes service reliability and the protection of candidate, hirer, student, employee and business data.	Hardware and peripherals	Direct – Low risk Tier 2 & 3 suppliers – Low/Medium/High risk
		Software and services (licenses and subscriptions, analytics services, cloud and data centre storage)	Direct - Low risk Tier 2 & 3 suppliers - Low/Medium risk
Business Services	SEEK leverages business and professional service suppliers to obtain specialist resources and expertise to meet specific technical and product needs, working in conjunction with its permanent workforce.	Technical consulting services, systems implementation, legal, professional and audit services, specialist contractor agencies	Direct - Low risk Tier 2 & 3 suppliers - Low risk
Marketing	SEEK's marketing team works with a broad range of creative and media suppliers, across both digital and traditional media channels, to reach and engage candidates and hirers across key segments.	Digital (media and advertising, creative agencies, public relations)	Direct – Low Risk Tier 2 & 3 suppliers – Low risk
		Promotional products and events	Direct – Low risk Tier 2 & 3 suppliers – Low/Medium/High risk
Office services and supplies	SEEK engages a range of suppliers to deliver goods and services integral to the provision of a safe, productive and enjoyable work environment for its employees.	Services (cleaning and maintenance, security services, waste management)	Tier 2 & 3 suppliers – Low/Medium/High risk
		Goods (office furniture, food and beverage)	Direct – Low risk Tier 2 & 3 suppliers – Low/Medium/High risk

Geographic risk

SEEK has offices and suppliers throughout South-East Asia and in China, Hong Kong and Latin America. In some of these regions, a lack of government oversight and socio-economic complexities result in some industries operating in ways that would be considered modern slavery in Australia.

Supply chain risk profiles across SEEK's main office locations

SEEK ANZ – Australia

The Global Slavery Index estimates that in Australia there are 0.6 modern slavery victims for every thousand people

Industries with elevated risk relevant to SEEK ANZ's supply chain are:

- Fit-out and construction
- Technology - infrastructure
- Cleaning services
- Hospitality and food services
- Promotional products and apparel

SEEK Asia – Malaysia

The Global Slavery Index estimates that in Malaysia there are 6.9 modern slavery victims for every thousand people

Industries with elevated risk relevant to SEEK Asia's supply chain are:

- Technology – infrastructure
- Promotional products and apparel
- Hospitality and food services

OCC – Mexico

The Global Slavery Index estimates that in Mexico there are 2.7 modern slavery victims for every thousand people

Industries with elevated risk relevant to OCC's supply chain are:

- Security services
- Cleaning services
- Corporate events

Catho – Brazil

The Global Slavery Index estimates that in Brazil there are 1.8 modern slavery victims for every thousand people

Industries with elevated risk relevant to Catho's supply chain are:

- Cleaning services
- Security services
- Hospitality and food services
- Furniture
- Technology - infrastructure
- Temporary staffing agency

SEEK has established a global and regional view of modern slavery risks in its supply chains and has identified industries with elevated modern slavery risks for each business. Technology infrastructure, cleaning services, hospitality and food services have elevated modern slavery risk in the majority of regions in which SEEK operates. These industries are also included in SEEK's primary categories of spend. SEEK will prioritise assessing and addressing the modern slavery risk of its suppliers in these industries.

SEEK Asia's headquarters are located in Malaysia, which has a relatively high incidence of modern slavery. SEEK has worked closely with SEEK Asia staff to identify and mitigate modern slavery risks in its supply chains in Malaysia. This location will receive additional assessment over the next 12 months.

Impact of COVID-19 on SEEK's modern slavery risk

Operations

As part of its commitment to employees, SEEK did not make any reduction in employment numbers due to COVID-19. SEEK scaled up its fair hiring initiative, increased the resources assigned to supply chain governance and continued the Modern Slavery Program.

Employment platforms

On SEEK's employment platforms, job ad volumes declined rapidly in March and April 2020. The recovery started across SEEK's key markets from May 2020 and by March 2021, SEEK's largest market Australia and New Zealand had recovered to record high job ad volumes.

Border closures and travel restrictions impacted the market for overseas Filipino workers. Job ads on Workabroad in the Philippines, the largest employment platform for overseas Filipino workers, reduced by more than half during FY2021. Workabroad used the period of low job ad activity to implement changes following the due diligence review in FY2020. This is discussed further on page 15.

Supply chain

SEEK was unable to undertake one of its planned activities to address modern slavery risks: a cleaning services audit across SEEK's offices. To be effective, this audit would involve face to face interviews with individuals performing cleaning services without management present. Due to office closures and limitations on face to face meetings, this was not possible. The cleaning services audit remains a priority for SEEK and will be conducted as soon as government restrictions within each region allow.

During FY2021, most SEEK staff worked from home and therefore sourced their own office supplies such as office furniture, computer accessories and stationery. This reduced SEEK's ability to identify and address modern slavery risk as these purchases were made outside SEEK's procurement processes and supply chains or the application of SEEK's modern slavery due diligence framework.

Information for SEEK's Australian customers about SEEK ANZ's modern slavery risk

The purpose of this disclosure is to provide customers of SEEK in Australia with information for their supply chain risk assessments.

SEEK's employment platform in Australia has a low inherent risk of modern slavery. The platform operates from Australia, which has a low prevalence of modern slavery. SEEK's workforce comprises mostly permanent employees in skilled office-based roles, with 9% employed on a fixed-term or casual basis.

SEEK predominantly engages suppliers with a lower inherent risk of modern slavery, namely technology, marketing and business services. The majority of SEEK ANZ's suppliers are located in Australia, New Zealand or the United States of America, all of which have a low prevalence of modern slavery.

In FY2020, SEEK began an on-going program of work to assess those individual suppliers to SEEK's ANZ business that indicated elevated inherent risks of modern slavery. No instances of modern slavery in SEEK's supply chain were identified or reported during FY2021. Supplier due diligence and supply chain risk assessments continue.

Jobs advertised on the employment platform www.seek.com.au are for roles in Australia and are subject to anti-discrimination laws. Hirers pay to advertise and candidates do not pay to get jobs in Australia. Job ads that may result in a candidate paying for a job breach SEEK's Advertising Terms and Conditions.

Despite low inherent risk, a due diligence assessment of the SEEK Australia employment platform was performed during FY2021. This assessed the current controls over fraudulent job ads, which are managed by SEEK's Trust and Security team. These controls are designed to prevent and detect fraudulent job ads, including deceptive recruitment and fraudulent hirer accounts.

Controls include:

- automated blocking and review of job ads containing blacklisted terms and phrases
- verifying hirers' details
- manually reviewing each job ad posted by a first-time hirer
- a 'Report this job' channel to encourage candidates to report suspicious job ads
- automated identification of job ads asking for payment, as well as job ads and new accounts created from suspicious data points such as IP addresses.

The due diligence concluded that the controls are designed effectively to prevent, detect and correct fraudulent job ads. The SEEK employment platform in Australia is at low risk of being used for deceptive recruitment leading to modern slavery.

Actions to assess and address modern slavery risk on SEEK's employment platforms

Deceptive recruitment is a covert activity. Jobs advertised on SEEK's employment platforms do not openly recruit for jobs involving modern slavery. To identify and address modern slavery risks for candidates, SEEK takes a three-step approach:

1. Analyse the employment platforms for inherent modern slavery risk
2. Assess the operation of individual employment platforms through due diligence reviews
3. Address modern slavery risks by implementing remedial actions

> Analyse

During FY2020, a methodology was developed to analyse the inherent risks of each SEEK employment platform being linked to modern slavery practices. This prioritises modern slavery risk assessments and action.

SEEK operates employment platforms in Australia, New Zealand, Hong Kong, South-East Asia, Brazil and Mexico and, in some countries, multiple platforms. Each employment platform is assigned a country risk rating based on external data available through the Walk Free 'Modern Slavery Index' and qualitative data produced by the '2020 Trafficking in Persons Report' produced by the US State Department. Local recruitment practices associated with an employment platform increase the risk rating, for example overseas placements, pooled labour, placement fees and job ads specifying age or gender. Due to the significant impact of COVID-19 on job ad volumes since early 2020, the volume of job advertisements displayed during calendar year 2019 informed the scale of the inherent risk.

This analysis provides an inherent risk rating for each employment platform and is performed at least annually. During FY2022 this assessment will be expanded to include the Jora platforms.

> Assess

SEEK prioritises its assessment activities based on the inherent risk rating for each employment platform being linked to modern slavery. For FY2021, this resulted in due diligence of the employment websites in Indonesia and Thailand reported on page 12.

Since the first SEEK website, *seek.com.au*, was launched in 1998, SEEK has continuously improved product and search technology. SEEK's Australia and New Zealand employment platform is the most advanced in terms of product and technology capability. This includes automated processes to counter potential fraud by 'bad actors', for example job ads that ask candidates for personal information or try to recruit for illegal activity. Harnessing technology, data and insights, SEEK's security processes prevent and detect potential deception and fraud through a range of measures including:

- Checking the validity of hirers before they advertise
- Automated job ad templates ensuring that job ads are transparent
- Automated and manual checking of job ads for words associated with fraudulent ads and suspicious metadata
- Alerting candidates to the risks of deceptive recruitment and encouraging them to report concerns through available channels.

SEEK has developed a methodology to assess job ads for indicators of deceptive recruitment. This assesses the quality and effectiveness of the measures to prevent deceptive recruitment on each employment platform. Testing of these measures is performed by SEEK's Risk and Assurance team. The methodology also considers the specific risks associated with local conditions, recruitment practices and the nature of the hirers and roles.

> Address

As the operator of online employment platforms, SEEK uses technology to improve its systems to protect the safety of candidates interacting with the platforms. Where possible, SEEK leverages its relationships with hirers to improve job ad transparency and online recruitment practices. As hirers and recruitment agencies directly post their job ads, SEEK does not have visibility of the ultimate jobs. This limits SEEK's ability to take direct action to improve recruitment practices and working conditions of jobs advertised on its employment platform.

If the findings of the due diligence assessment identify remedial actions, these are agreed with local management. Examples of actions that have been implemented as a result of the Modern Slavery Program include:

1. *Improving candidate protection measures on the employment platform.* Workabroad implemented a 'Report this job' feature to encourage candidates to report misleading ads. This grievance mechanism is supported by trained staff in Manila who understand the risks and regulations for overseas workers and can address or escalate any complaints.
2. *Using leverage with hirers to improve practices.* Workabroad helped hirers to use an improved job ad template which increases the job description to improve transparency for candidates.

More broadly SEEK is improving its approach to protecting candidates from deceptive recruitment across SEEK Asia. Candidate protection is managed by each business. The current focus, called Marketplace Unification, leverages SEEK's existing product and technology capability to create a single platform. Once complete, the unified platform will allow SEEK to implement consistent standards across the SEEK Asia employment platforms. This will enhance the capacity to monitor for and mitigate against fraudulent activities and deceptive recruitment practices that may be associated with modern slavery risk.

Employment platforms due diligence in FY2021

The due diligence assessments during FY2021 examined the risks that SEEK's job platforms in Indonesia or Thailand advertise jobs that may be deceptive recruitment resulting in modern slavery including forced labour, trafficking and debt bondage.

Due Diligence

Indonesia- JobStreet ID

SEEK operates JobStreet ID (JSID) as part of the JobStreet South-East Asian business.

Job seekers in Indonesia predominantly search for jobs offline, by word-of-mouth or via social media rather than engaging with online employment platforms. Of the jobs advertised online, JSID has the largest online employment platform in Indonesia with 46% of the Indonesian online jobs market.

Due diligence of this platform was undertaken because modern slavery is prevalent in Indonesia. Indonesia also has the largest population of the countries in which SEEK operates. The due diligence of the JSID platform during FY2021 did not identify instances of modern slavery.

The due diligence identified operational features of JSID that reduce inherent modern slavery risks:

- JSID does not advertise jobs for overseas placements.
- Recruitment firms in higher risk industries such as domestic services, plantation and fishing do not advertise on JSID.
- Manpower pooling ads are not permitted on JSID, which requires that each ad is for a unique job.

JSID operates preventative, detective and monitoring controls to identify and prevent ads that may lead to deceptive recruitment. Onboarding new hirers involves checks for corporate legitimacy, scams and fraud. The job ad template results in sufficient content to enable candidates to make informed decisions prior to application. All ads are automatically screened and 80% of ads are then manually reviewed by the quality control team. These measures were independently assessed by SEEK's Risk and Assurance team as effective.

JSID is targeting accelerated market penetration in Indonesia with a strong focus on the non-corporate market segment. Accelerated growth and new non-corporate hirers may alter the risk profile or the JSID team's capacity to maintain the controls to prevent deceptive recruitment. This issue will be assessed during FY2022 and FY2023 as part of the Modern Slavery Program.

Due Diligence

Thailand - JobsDB TH

SEEK operates JobsDB TH (DBTH) as part of the JobsDB South-East Asian business.

The inherent risk of deceptive recruitment on DBTH arises because modern slavery is prevalent in Thailand. DBTH is a relatively small employment platform in SEEK's wider portfolio and has about 10% market share of the Thai online jobs market.

The nature of the DBTH business and the types of jobs advertised significantly reduce the risk of deceptive recruitment. DBTH advertises mainly premium placements, with 80% of the job ads for professional roles and over 75% of the candidates holding at least a Bachelor's degree. Over 90% of the job ads are for placements within Bangkok. Jobs at higher risk of modern slavery tend to be for non-professional roles and located in rural areas or overseas.

The due diligence of the DBTH platform during FY2021 did not identify any instances of modern slavery. The measures to identify or prevent deceptive recruitment were assessed and certain aspects were not effective. Improvements were identified such as expanding the job ad template and broadening hirer validation, ad screening and quality control processes. These remedial actions were entered for tracking in SEEK's risk monitoring tool LogicGate, and will be reviewed in FY2022 as part of the Modern Slavery Program.

Fair hiring initiative

Modern slavery is the most serious risk to candidates in job searching. SEEK is committed to addressing the full range of risks to candidates when engaging with SEEK's employment platforms. Particularly in South-East Asia, these risks arise when job ads are placed that may not lead to modern slavery but could:

- Expose candidates to illegitimate or illegal jobs, for example fraud or migration scams
- Unlawfully charge or not disclose candidate placement fees so that the worker pays for a job
- Discriminate against or disadvantage some candidates.

SEEK's Fair Hiring Initiative involves close examination of SEEK's processes and systems through the lens of these risks to identify platform weaknesses and vulnerabilities that could be exploited by unscrupulous actors. Various existing controls across SEEK Asia address these vulnerabilities. These will be strengthened through leveraging SEEK ANZ product and technology capability as part of the move to a single platform.

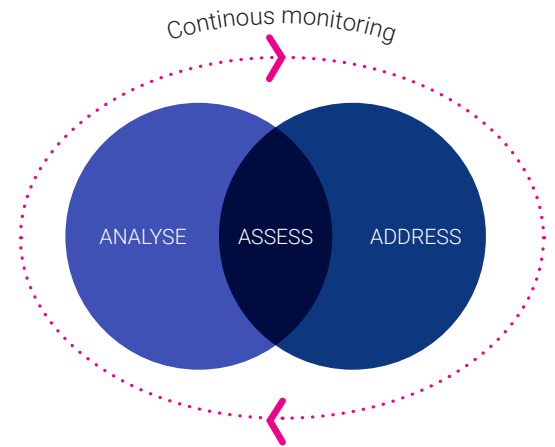
SEEK Asia is working to provide candidates with clarity and awareness of their rights and warnings about known unfair hiring practices, particularly affecting migrant, manual and domestic workers.

Actions to assess and address modern slavery risks in SEEK's supply chains

SEEK has developed a framework to identify and address modern slavery risk and incidents within the supply chain. This framework has been adopted by SEEK ANZ, SEEK Asia, Catho and OCC and takes a three step approach:

1. Analyse suppliers for inherent modern slavery risk
2. Assess operations and governance of suppliers with medium or high inherent risk
3. Address modern slavery risk by working with suppliers to take remedial actions

Due to the complexities involved in drawing on local knowledge and experience, as well as local legislation and availability of data, there are some differences in each subsidiary's approach to the framework.



Analyse

Since FY2020, SEEK has engaged with a supply chain risk analysis and monitoring technology platform to identify inherent risks of modern slavery within SEEK's supply chain. The platform's methodology and associated analysis indicate the inherent risks of human rights abuses across SEEK's supply chain by drawing on data from a wide range of reputable sources, including Transparency International's 'Corruption Perception Index' and the United Nations 'Multidimensional Poverty Index'.

During FY2021, SEEK used a combination of analytics provided by the technology platform and manual risk analysis to identify levels of inherent modern slavery risk analysis in its global supply chain. The analysis was conducted based upon country of supply, supplier industry and type of good or service provided by that supplier.

Suppliers with elevated inherent risks of modern slavery were identified. Assessment commenced to identify controls, policies and practices that those suppliers had in place to manage the elevated risk of modern slavery in their operations and supply chains.

SEEK plans to begin reviewing tier 2 suppliers in high-risk industries using the due diligence framework by FY2023.

Assess

SEEK engaged selected suppliers identified as having elevated inherent risks of modern slavery to conduct a more detailed risk assessment of the supplier's operations and supply chain.

Information was requested from suppliers including:

- a. whether the supplier performed a modern slavery risk analysis of its supply chain and any conclusions from this activity;
- b. the names of organisations within its supply chain or operations that have been identified as involving elevated risks of modern slavery; and
- c. any anti-modern slavery policies, Supplier Code of Conduct or other documentation that seeks to address modern slavery across its supply chain and operations.

Suppliers unable to answer these questions or provide acceptable documentation were asked to work with SEEK to address modern slavery risk. All such suppliers were subsequently able to provide acceptable information or agreed to work with SEEK.

If a supplier is unable or unwilling to work with SEEK and take satisfactory steps to address gaps in controls, SEEK will take proportionate remedial steps, up to and including contract termination if necessary.

Address

SEEK is committed to addressing and remediating any instances of modern slavery identified in its supply chain. During FY2021 SEEK did not identify and was not aware of any modern slavery incidents committed by any supplier.

Whilst no remediation activities were required in relation to specific suppliers, in FY2021 SEEK undertook the following governance and engagement activities to reduce the risk of modern slavery across its supply chain:

1. Required new and renewed suppliers to SEEK ANZ to sign SEEK's Supplier Code of Conduct, which requires suppliers to take action such as:
 - Take all reasonable steps to identify and eliminate human rights abuses, including modern slavery, in their supply chains.
 - Establish a whistleblowing, or other anonymous communication channel, for employees, suppliers and other stakeholders to report non-compliance, illegal or unethical practices without fear of reprisal.
2. Implemented requirements to obtain supplier commitment to anti-modern slavery practices in relevant supply contracts, based upon the size and category of spend, as well as any inherent risks.
3. Worked directly with legacy suppliers with elevated modern slavery risks to mitigate risk and address gaps in control environments.

The purpose of these activities was to:

- reduce the risk of modern slavery in SEEK's supply chain;
- clearly communicate SEEK's expectations to suppliers; and
- build transparent and collaborative relationships.

Supply chain due diligence in FY2021

Due Diligence

Working with legacy suppliers to address elevated modern slavery risk

Promotional products

SEEK ANZ uses a number of suppliers for promotional items such as water bottles, face masks and clothing.

One of these suppliers was identified as having high inherent risk for modern slavery due to a large proportion of its items being manufactured in China and was selected for risk assessment.

When asked about its approach to addressing modern slavery, the supplier was unable to provide acceptable answers and did not have a modern slavery statement or policy in place. SEEK shared further information on modern slavery and its own anti-modern slavery framework, and requested that the supplier work with SEEK to improve the supplier's approach to modern slavery.

In due course, the supplier developed a modern slavery policy and its leadership completed further training in the form of industry accredited modern slavery courses.

The supplier continues to purchase items from high-risk locations and so tier 2 and 3 suppliers remain a concern. SEEK will therefore continue to work with the supplier to further reduce risk.

Cleaning services

Cleaning services is a high-risk industry for modern slavery. Labour exploitation in the cleaning industry is well-documented and cleaning services within Australia have been identified by the Australian Government as a key risk area for modern slavery. Examples of modern slavery practices occurring within the cleaning sector include the withholding of wages, immigration-related coercion and threats, deceptive recruitment, debt bondage and dangerous and substandard working conditions.

Based on SEEK's inherent risk analysis, SEEK's cleaning services provider in Melbourne was identified as having an elevated level of inherent risk of modern slavery.

The supplier underwent SEEK's risk assessment process, during which interviews with the supplier's executive team identified gaps in its controls to manage modern slavery risk.

Following interviews with management and information shared by SEEK in relation to anti-modern slavery practices, the supplier conducted an internal review of its operations and supply chain. The review found no evidence of modern slavery practices, and the supplier has since committed to ongoing monitoring to ensure modern slavery does not occur in the future.

A report outlining the findings of the review and associated attestations was provided to SEEK. SEEK will continue to work with the supplier. During FY2023 SEEK intends to conduct a due diligence audit of cleaning suppliers across the rest of its business.

Due Diligence

Working with new suppliers to minimise modern slavery risk

Fit-out of Melbourne Headquarters

During FY2021, SEEK engaged a supplier to deliver the fit-out of its new Melbourne headquarters.

In Australia, construction is considered a high-risk industry for modern slavery due to high demand for low-skilled workers who are vulnerable to exploitative practices, and the use of raw materials, often sourced from high-risk geographies. Furthermore, business models in the construction industry tend to rely on outsourcing, which increases the complexity of operations and supply chains and reduces the visibility of labour risks and impacts.

To manage this risk, SEEK implemented governance and engagement processes to ensure that the supplier was aware of SEEK's expectations and requirements and had a modern slavery due diligence process in place.

These included:

- a. The supplier committing to SEEK's Supplier Code of Conduct.
- b. A modern slavery clause in the contract committing the supplier to:
 - o Take all reasonable steps to ensure there is no modern slavery in its operations and supply chain, nor those of its subcontractors and suppliers.
 - o Undertake due diligence of its own suppliers and subcontractors to ensure that any risks or occurrences of modern slavery in its supply chains or any part of its businesses are identified, assessed and addressed.
 - o Implement a system of training for its employees in relation to the identification, assessment and addressing of modern slavery.
 - o Undertake remediation actions to address and cease any instances of modern slavery in its supply chains.
- c. The supplier providing a report detailing its modern slavery due diligence process and outcomes.

At the completion of its review the supplier provided a report to SEEK outlining its due diligence process and the modern slavery training delivered to key staff.

Office goods and services - Coffee

In FY2020, SEEK ANZ spent approximately \$45,000 on coffee for SEEK's headquarters in Melbourne.

Inherent risk analysis identified coffee as a product with elevated risk for modern slavery. Research and analysis of global coffee production indicates an increased risk of producers and farm workers often experiencing unsafe working conditions and low pay, as well as the use of child labour.

During FY2021, SEEK identified and engaged an ethical and sustainable office coffee business to provide coffee products, machines and services.

All coffee supplied is Fairtrade accredited and produced by small-scale farmers or plantations that meet international Fairtrade social, economic and environmental standards.

The supplier is also B Corp certified, meeting comprehensive and transparent legal and performance standards, and working to alleviate poverty, address climate change and build strong local communities and safe places to work.

Assessment of the effectiveness of actions taken

Employment platforms

Remedial actions to reduce the risk of deceptive recruitment are assessed for the effectiveness of design and operation. During FY2021 this involved assessment of the actions taken by Workabroad following the due diligence assessment in FY2020.

Implementation of remedial actions to reduce the risk of deceptive recruitment is tracked and reported through established lines of accountability. KPIs are established and scheduled for review as part of the Modern Slavery Program. Due diligence findings and remedial actions are recorded in the SEEK risk and audit findings database, LogicGate.

The inherent risk of each SEEK employment platform being linked to modern slavery practices is re-assessed at least annually. Adjustments may be made based on changes to the business or new information about modern slavery risks, including information in the Modern Slavery Statements of other companies.

Complaints received through the employment platforms via 'Report this job' and contacts received by the Service Centre are monitored and addressed. If a complaint leads to the discovery of a deceptive recruiter, the relevant job ads are removed from the platform and the hirer re-assessed.

Workabroad assessment

Workabroad in the Philippines advertises 95% of legal jobs for overseas Filipino workers (OFW). The due diligence review of Workabroad in FY2020 and remedial actions are outlined in the SEEK Modern Slavery Statement 2020 on page 6. SEEK's Risk and Assurance team confirmed completion of these remedial actions during FY2021. Following these changes:

- Prior to posting each job ad, Workabroad receives documented regulatory approval for the job from the recruitment agent.
- Job ads are manually checked using improved quality control processes.
- The job ad template provides significantly more information for candidates.
- A 'Report this job' function has been activated and candidates are encouraged to report deceptive job ads.

The ability to assess the effectiveness of the actions taken to reduce deceptive recruitment was limited by COVID-19. The dramatic decrease in recruitment and OFW placements due to travel and border restrictions and embassy closures resulted in a 75% reduction in OFWs in 2020 to the lowest deployment level in over 30 years.

Improvements by Workabroad have increased the transparency of the jobs so that candidates can better assess their risks. Some job ads have been blocked or removed during quality control checks due to potential risks to candidates. Workabroad has used its leverage with recruitment agents to prepare better job ads using an improved template and to lift hirers' awareness of modern slavery risks to candidates.

Despite these improvements, job ad quality is inconsistent. This is because Workabroad has limited control over the job ads posted. The regulator, the Philippines Overseas Employment Agency (POEA), approves 'job orders' submitted by licensed recruitment agents. Once approved, the agent is legally permitted to advertise the job. POEA approves manpower pooling as well as unique jobs. Manpower pooling involves advertisements for generic jobs that may not include the overseas employer, job location, placement fees, pay or conditions. In addition, during the pandemic the POEA significantly reduced its operational resources, resulting in delays and preventing some recruitment agents from providing job approval documentation.

Recruitment agents are prohibited by law from charging placement fees for their services to domestic workers, seafarers and workers going to countries that prohibit placement fees. Otherwise placement fees are capped at the equivalent of one month's salary. Workabroad mandates that placement fees are disclosed in each job ad. Despite this, transparency in job ads of placement costs for workers has not significantly improved as recruitment agents levy workers after they engaged. This is done by over-charging for mandatory training, medical and accommodation costs, or working in tandem with lending agencies. Workers for their part regard the payment of fees as standard practice and authorities allow the practice to go on unchecked if there is no technical violation of the law. The challenge is rooted in a deeper structural problem: permitting the recruitment sector to charge workers - rather than employers - fees for their services.

Supply chain

SEEK measures the effectiveness of its supply chain modern slavery framework based on the metrics set out below. During FY2021, SEEK established a baseline for each metric and identified targets for FY2022.

Effectiveness indicator	Metric	FY2021 Baseline	FY2022 Target
Risk analysis coverage	Number of suppliers that have been subjected to inherent risk analysis as a percentage of total suppliers and total spend value.	Suppliers: 54% Spend: 27%	Suppliers: 70%
Risk assessment coverage	Number of suppliers that have been subjected to a risk assessment as a percentage of suppliers identified as having elevated inherent risk for modern slavery during the period.	42%	50%
Rate of code of conduct acceptance	Number of suppliers that have accepted SEEK's Supplier Code of Conduct during registration or other onboarding with SEEK.	50%	75%

Looking to future Modern Slavery Statements

Current foundations

- Modern Slavery Program
- Modern slavery risk methodology to assess the risk of deceptive recruitment on employment platforms
- Framework to assess and address modern slavery risk in SEEK's supply chains

On the horizon

- Due diligence assessments of the employment platforms in Malaysia and across the Jora business during FY2022
- Employee training as part of the Fair Hiring Initiative and the engagement and management of suppliers
- Strengthened supplier due diligence and engagement processes
- Commence due diligence of tier 2 suppliers in industries with elevated risk
- Ongoing review of metrics and targets
- Partnering with businesses, NGOs and industry groups to improve approaches to modern slavery risk

Collaboration

SEEK's approach to the complex causes of modern slavery is strengthened through collaboration with NGO's, peer companies and experts.

SEEK Asia management engaged with a range of NGOs during FY2021 to expand their understanding of deceptive recruitment and migrant corridors in South-East Asia.

SEEK engaged with a leading Australian supermarket retailer with several years' experience in supply chain auditing in South-East Asia. Its Modern Slavery Statement had disclosed challenges with workers paying for jobs with suppliers in Malaysia. This engagement provided SEEK with insights based on expert assessments.

Consultation with SEEK businesses

The Modern Slavery Program is planned in consultation with senior management at SEEK ANZ, SEEK Asia, OES and other SEEK businesses. During FY2021, SEEK continued a series of briefing sessions across SEEK, specifically with SEEK Asia, OCC and Catho.

The reviews of the employment platforms in SEEK Asia were performed by corporate and local specialists. The Chief Executive Officer of SEEK Asia led the engagement across JobStreet, JobsDB and Workabroad. The SEEK Chief Risk Officer provided oversight of the review of the Indonesian and Thai employment platforms. These due diligence reviews involved the respective Country Managers and their leadership teams, which signed off on the findings and agreed actions.

A supply chain working group was created to establish a consistent and strong foundation of modern slavery practices across SEEK. Each business nominated an individual responsible for day-to-day management of modern slavery risk and provides regular reporting to the SEEK's Supply Chain Integrity Manager.

This Statement is a joint statement submitted by SEEK on behalf of its subsidiary, OES. This followed previous briefings with the Executive Team and Board of OES. Oversight of the modern slavery risk assessment and reporting for OES was provided by the Chief Financial Officer of OES.

Approval of the Modern Slavery Statement

This Statement was approved by the Board of SEEK.

As a joint statement this Statement was prepared in consultation with OES and signed by the Chairman of SEEK on behalf of SEEK and OES.



Graham Goldsmith
Chairman
Dated 2 December 2021

Annexure

Index to disclosures required by the Modern Slavery Act 2018 (Cth)

Mandatory reporting criteria	Topic heading and location
a) Identify the reporting entity	About this Statement: page 4
b) Describe the reporting entity's structure, operations and supply chains	About SEEK: page 1 About SEEK's structure and operations: page 1 and page 4 About SEEK's supply chains: page 5 About OES's structure, operations and supply chains: page 5
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	Modern slavery risks: Employment platforms: page 7 Office operations: page 7 Supply chain: page 8 Impact of COVID-19 on SEEK's modern slavery risk: page 10
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	Actions to assess and address modern slavery risk on employment platforms: page 11 Employment platforms due diligence in FY2021: page 12 Actions to assess and address modern slavery risks in SEEK's supply chains: page 13 Working with legacy suppliers to address their elevated modern slavery risk: page 14 Working with new suppliers to minimise SEEK's modern slavery risk: page 14 Modern slavery aware culture at SEEK: page 6 Collaboration: page 16
e) Describe how the reporting entity assesses the effectiveness of these actions	Assessment of the effectiveness of actions taken Employment platforms: page 15 Supply chain: page 15
f) Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Consultation with SEEK businesses: page 16
g) Any other information that the reporting entity considers relevant	Governance of SEEK's Modern Slavery Program: page 6 Information for SEEK's Australian customers about SEEK ANZ's modern slavery risk: page 10 Looking to future Modern Slavery Statements: page 16



SEEK Limited is a company incorporated in Australia and listed on the Australian Securities Exchange. Its registered office and principal place of business is:

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Online Education Services Pty Limited is a company incorporated in Australia. Its registered office and principal place of business is:

Level 6, 600 St Kilda Rd
Melbourne, VIC 3004
ABN 75 148 177 959

Concerns about modern slavery affecting the SEEK Group can be reported to:

companysecretary@seek.com.au

The SEEK ANZ whistleblower channel at:

www.SEEKWhistleblower.deloitte.com.au

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