

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024



This statement is made pursuant to obligation under section 54(1) of the Modern Slavery Act 2015 (the Act), for the financial year ending 30 June 2024.

Slavery and Human Trafficking are human rights abuses and have no place in our business or in our supply chain. In line with our Purpose and our Values, we are dedicated to operating our business responsibly and committed to the highest standards of conduct.

Working for your tomorrow' is Hays' promise to customers that their success, both now and in the future, is at the very heart of what we do. By investing in lifelong partnerships that empower people and organisations to succeed we create social and economic value for our stakeholders.

At Hays we are proud of our strong sense of purpose and our values – including to 'do the right thing' – and are therefore fully committed to mitigating the risk of slavery and human trafficking within our business and our supply chain.

As a global workforce solutions business, everyday our people provide thousands of work opportunities for candidates. As a business with people at its core we have an important responsibility, to our colleagues, towards the candidates who we offer access to work, with our clients as well as the workers in our supply chain.

We recognise that modern slavery and human trafficking manifests for many reasons and particularly when people are vulnerable from situations such as poverty, lack of education, unstable social and political conditions, economic disparities, climate change and war. Such situations are exacerbating factors that can expose and increase vulnerability to exploitation.

With these exacerbating situations at play globally, we understand it's important to have clear internal processes, set suppliers standards, to be an active community partner, particularly in the areas of employability and inclusion and to progress our climate work in the ultimate pursuit of Net Zero.

In FY24 we strengthened our focus on human rights publishing our Human Rights Statement on the Hays PLC corporate website and completed a desk-based human rights review. We became signatory to the UN Global Compact in alignment with their ten principles of responsible business.

Within our respect of human rights we have prioritised Diversity, Equity and Inclusion (DE&I). This is in terms of our own global business, working with clients and as a main focus within our community engagement programme 'Helping for Your Tomorrow'.

Our own DE&I strategy is focused on gender balance, racial inclusion, LGBTQ+ inclusion, disability, generations and social mobility. We are working to increase the diversity of the talent pools that we reach and attract, better enable our own inclusive hiring practices, further implement equity standards and increasingly enable our DE&I Employee Resource Groups.

By progressing our own DE&I agenda we in turn are better equipped to partner with our clients to help them address their DE&I challenges as well as better accessing wider talent pools. Through our FAIRER consulting businesses we also work with clients directly and globally on their approach to DE&I.

Our community engagement programme 'Helping for Your Tomorrow' aims to support inclusive employment through charitable partnerships and volunteering to help further employability and skills development focused on six key societal groups. These are in terms of disability inclusion, ethnic minorities, LGBT+ communities, mature-aged workers, youth engagement and underutilised talent. During the year we furthered our community links now having some 100 charitable partners and delivered over 25,252 volunteering hours globally.

Recognising the importance of continual improvement and the challenges faced in relation to modern slavery and human trafficking risk we have become members of the Slave-Free Alliance (SFA). SFA is an international social enterprise, wholly owned by the global anti-slavery charity Hope for Justice.

Our statement has been published in accordance with the UK Modern Slavery Act 2015 (the Act) and highlights the steps taken by Hays plc and its UK operating companies to mitigate the risk of modern slavery within our business and supply chain. The statement sets out the steps we have taken to mitigate modern slavery and the steps we intend to take next year.



We are dedicated to operating our business responsibly and committed to the highest standards of conduct

# MODERN SLAVERY AND HUMAN TRAFFICKING

We understand modern slavery and human trafficking as defined in the Act, the UN Universal Declaration of Human Rights and the conventions of the International Labour Organisations (ILO), particularly relating to forced or compulsory labour.

We recognise that forced labour is a form of slavery and can include debt bondage and the restriction of a person's freedom of movement whether that be physical or non-physical.

According to the International Organization for Migration (IOM) World Migration Report 2024, the number of international migrants is estimated to be around 281 million globally, with almost 70% of those of working age estimated to be migrant workers.

The number of internally displaced persons due to violence and conflict has reached 55 million. In September 2022, the ILO reported the 2021 Global Estimates indicate there are 49.6 million people in situations of modern slavery on any given day and estimated 27.6 million are in forced labour, which includes over 16 million in the private sector including construction, manufacturing, mining, utilities, agriculture, forestry, fishing and domestic work.

In this context, we recognise that we, and other businesses including our suppliers and our clients, are exposed to the risk of modern slavery and human trafficking, in operations and supply chains.



# OUR BUSINESS, ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

Hays is a leading global expert in qualified, professional and skilled recruitment, employing some 13,000 people through a subsidiary network in 33 territories across 21 specialisms. We are structured with four key regions: UK & Ireland; Germany; Australia & New Zealand; and Rest of World.

Our business model is centred around solving our clients' talent problems. Our services range from Contracting, Temp and Permanent Role recruitment to complex, integrated HR solutions.

As a recruitment business we source candidates for clients. This may involve the introduction of candidates to Hays by external agencies prior to the onward supply to our clients. We take our responsibility for supplying staff extremely seriously and are aware of the potential for being targeted by traffickers and unlicensed gangmasters.

In addition to our core recruitment services our business model has evolved to become much more embedded with our clients, based on deep human resource partnerships and outsourced solutions such as Managed Service Provision and Recruitment Process Outsourcing. We provide detailed compliance, background and onboarding services, and total talent management. We offer consulting services in areas such as Equity, Diversity and Inclusion, and we provide Project Services in areas such as Technology and Life Sciences.

We are a leading global talent solutions business, helping, millions of people with their career each year and solving clients' talent problems in real time.

We are predominantly Private sector-focused but also service Public sector clients in some markets. We work with large clients within international reach through our Global Enterprise Solutions business to service some of the largest organisation in the world, particularly with multi-year outsourcing contracts as well as working with SMEs on more one-off placements.



We are a leading  
global talent solutions  
business, helping,  
millions of people with  
their career each year

## 33 COUNTRIES

Australia	Italy	Canada
New Zealand	Luxembourg	Chile
Germany	Netherlands	Columbia
UK	Poland	Mexico
Ireland	Portugal	USA
Austria	Romania	China
Belgium	Spain	India
Czech Republic	Sweden	Japan
Denmark	Switzerland	Malaysia
France	UAE	Singapore
Hungary	Brazil	Thailand

## 21 SPECIALISMS

Accountancy & Finance	Financial Services	Retail
Banking & Capital Markets	Health & Social Care	Sales & Marketing
Construction & Property	Human Resources	Sustainability
Contact Centres	Legal	Technology
Education	Life Sciences	Telecoms
Energy, Oil & Gas	Office Support	
Engineering & Manufacturing	Procurement	
Executive	Resources & Mining	

As a Public Limited Company Hays has a Board of executive and non-executive directors. The Hays plc Board is collectively responsible for setting the Group's strategic objectives, determines the risk appetite and control framework within which those objectives are achieved. The Board provides oversight of the Company and its businesses within a robust governance structure that helps achieve the long-term success of the Company and creates value for stakeholders.

The Executive Leadership Team chaired by the Chief Executive Officer is responsible for the day-to-day management of the Hays business and operations and for monitoring the detailed performance of all aspects of our business.

In the operation of our global business, we purchase a variety of goods and services, rent offices, purchase utilities, recruit people for our own organisation as well as source candidates for clients. Our suppliers provide us with property and facilities management, IT and telecoms, office equipment, marketing, financial and legal services, office consumables, catering and food, cleaning services, business travel and accommodation, banking services, energy, and office furniture, amongst others. Across Australia & New Zealand, Germany, UK & Ireland and the USA we have over 130 suppliers where purchases exceed a £5K annual spend.

We seek to have close relationships with our suppliers and good visibility of our supply chain. We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally-compliant and professional manner by adhering to our Supplier Code of Conduct. We also expect our suppliers to promote similar standards in their own supply chain.



# OUR BUSINESS AND SUPPLY CHAIN SCOPE

## Supplier of goods and services

- More than 130 key suppliers for:
- IT equipment and Tech
- Travel & accommodation
- Office furniture & consumables
- Catering & food
- Energy
- Banking & Insurance
- Office rental & facilities management
- Employee Benefits
- Marketing & Advertising
- Legal Services

## Offices and colleagues

- 33 countries
- 250+ offices worldwide
- 21 specialisms
- 8,590 consultants

## Candidates, clients and communities

- c76,660 permanent placements
- c 240,000 temporary assignments
- 17,673 volunteering hours
- 20% employee volunteering rate

To read more about our business please click [here](#)



# OUR **POLICIES** AND **CONDUCT**

Our purpose is to be a business that benefits society by investing in lifelong partnerships that empower people and organisations to succeed.

**Our values** aim to reflect this purpose and promote our strengths and capabilities as a global business. Our values serve to act as a Leadership Partner to our clients and customers. Under our values, we:

- Build partnerships
- Think beyond
- Do the right thing

Our values enable us to protect our reputation and build trust with our candidates, clients and other stakeholders. People are the heart of the business and we strive to recruit, train and develop the best talent in our industry and encourage our employees to reach their full potential.

Our relationships with clients, candidates, employees, business partners, suppliers and the communities within which we operate are based upon respect for individuals and their human rights. At Hays we are committed to our **Code of Conduct and Ethics Policy**, which reflects the way we operate.

Our **Human Rights Statement** sets out our respect of human rights and the human rights that are most salient to our business and our stakeholders having conducted a desk-based human rights review.

All staff within Hays are expected to act with integrity and honesty and behave in a way that is above reproach and to treat people fairly, with courtesy and respect, be responsible, respect diversity and community openly.

We have a **Whistleblowing policy** and encourage a culture of speak up so our people can freely raise any concerns. We provide our people a confidential reporting line, managed by an independent third party, accessible by telephone or online 24 hours a day, 365 days a year (as allowed under applicable law, employees may submit report to the confidential line anonymously in over 100 languages).

We have a zero-tolerance approach to bribery and corruption. All employees are required to comply with the Hays Anti-Bribery and Corruption Policy and undertake training on it annually. The policy prohibits the giving or receiving of bribes in any form. The offer or acceptance of any form of bribery is prohibited, including facilitation payments. Hospitality, gifts and improper offers or payments that seek to induce or reward improper performance or might appear to place any person under an obligation are prohibited.

As part of our approach to bribery and corruption, Hays likewise has a zero-tolerance approach to tax evasion and the facilitation of tax evasion.

We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally compliant and professional manner by adhering to our **Supplier Code of Conduct**.

Our Supplier Code of Conduct includes specific reference to Slavery and Human Trafficking, and states that suppliers must ensure they have taken steps to ensure their business operations are free from slavery and human trafficking practices whether in the UK or elsewhere, both internally and within their supply chains and other external business relationships.



# DUE DILIGENCE AND RISK ASSESSMENT

We recognise that there is a risk of modern slavery and human trafficking in relation to: (i) our own operations and the recruitment of our own employees, (ii) the recruitment and placement of candidates for our clients, and (iii) our supply chains related to the purchase of goods and services.

We further understand there to be a higher risk of modern slavery where workers are in lower skilled employment, away from home and / or working in temporary positions. We also understand that modern slavery and human trafficking risk is more prevalent in certain sectors and certain geographies, and that levels of awareness, understanding and reporting/ response options can differ. We are mindful of this in terms of the global nature of our business, and it is important for us to have sector-related specialisms. Our recruitment consultants focus on specific clients and sectors, which helps them to build their knowledge and expertise, as well as their awareness of contextual risks. It also helps Hays to understand where certain specialists may require additional training.

In furthering our understanding of risk, we are pleased to have joined as new members of the Slave-Free Alliance. As part of our membership, we have recently undertaken a gap analysis, which included a review of our due diligence and risk assessment process. This highlighted some potential opportunities to improve our efforts in this area, including incorporating candidate discussions as part of our audit process, and periodically updating our people of global human rights and modern slavery risks. To achieve this we will utilise resources such as the International Trade Union Confederation Global Rights Index and the International Labour Organization.



# MITIGATING RISK

## Mitigating risk in our own operations and in candidate placements

Doing the right thing – one Hays' core values – together with Employee Codes of Conduct help to create a framework for responsible business practices. We have robust processes within our business, which include:

- Our contracts of employment and contracts for our temporary workers comply with relevant local laws and ensure that individuals are entitled to at least the legal minimum (including written contract of employment, rights in relation to hours, pay and termination of the contract).
- We have appropriate policies and processes for conducting background checks on employees and candidates (including their right to work).
- We conduct records checks on our candidates to identify instances of duplicated data, such as bank details, which may be indicative of financial exploitation, and addresses, which may suggest overcrowded or unsuitable accommodation, both of which may be indicative of modern slavery. We intend on expanding these checks to cover contact and next of kin data.
- No employee or candidate will ever be charged direct or indirect fees to obtain work from us or by us when acting for a client.

We ensure strict compliance checks are carried for all candidates we supply. This includes verifying the identity of each worker and their right to work before placement commences.

## Mitigating risk with suppliers

We seek to foster long-term relationships with our key suppliers albeit suppliers are periodically subjected to tender requirements. We expect our suppliers to comply with our Supplier Code of Conduct. Given the regional nature of our global business supplier relationships are generally managed at the local level whereby appropriate governance controls form part of local procedure, contractual relationships and financial management. These are subject to review and compliance checks by our Internal Audit Team who schedule in relation to a combination of risk, performance, regularity and Group coverage.

As part of our current IS Transformation programme we have appointed a new Global Technical Procurement Director and are increasing centralisation of our technical procurement spend which is one of our most significant spend categories. This centralisation is assisting our focus on supplier engagement and supplier standards.



## TRAINING

**We expect all our people to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty.**

A training module on modern slavery and human trafficking has been developed. This covers what modern slavery is and who it affects, warning signs to look out for, the role of technology in modern slavery and how it can be used to combat it, business responsibilities and using reporting mechanisms to refer potential victims. Should any of our colleagues need any additional information or support with regard to human trafficking, forced labour, servitude and slavery this will be provided

Going forwards, we will implement a clear training plan with a view to include the latest legislation relevant to our countries of operations, and will include ever-evolving risk areas.

## EFFECTIVENESS AND PERFORMANCE

**To date, we have had no reported instances or suspected instances of modern slavery, or concerns, raised.**

As we seek to improve the general awareness of modern slavery across our people, we will obtain assurances that instances will not go unreported.

Following our gap analysis with Slave-Free Alliance, we identified recommendations in relation to policies, responsible procurement practices, risk assessment, due diligence, training and developing an escalation process, and will develop a clear action plan for delivery. Implementing these recommendations help us to continually improve, and enables us to measure our effectiveness in addressing modern slavery risks.

We participate in the EcoVadis ESG assessment and in FY24 achieved a year-on-year improvement. We have developed an action plan to increase our score further.



# NEXT STEPS

During FY25 we will continue to work with Slave-Free Alliance to help us shape a programme of work to:

- enable a documented risk-based review of our business and supply chain to focus on countries and industries identified as having a higher risk of modern slavery
- develop updated modern slavery training for colleagues
- improve our risk analysis and profiling
- increase our visibility of suppliers
- assess our client onboarding processes
- develop an escalation process, for use upon the identification of a potential modern slavery incident in our operations or supply chain
- identify improvement opportunities for particularly in relation to due diligence and for reporting on effectiveness and performance
- strengthen the understanding of responsibilities across the group.

In FY24 we established a Modern Slavery Working Group to drive the development and delivery of our approach across the Hays group, including representation from core functions, including Sustainability, HR, Legal, Technology, Operations, Risk and Compliance. This will be evolved in respect of the SFA gap analysis to drive and address the recommendations.

---

## Approval

Approved by the Board of Hays plc on 22 August 2024

Signed: Dirk Hahn

Position: Chief Executive

For and on behalf of Hays plc and Hays Specialist Recruitment Limited

---