

Modern Slavery & *Human Trafficking* *Statement*

FY2026

HAYS



CEO Introduction

At Hays, we put thousands of people into meaningful work every year. That is a privilege, and it is also a responsibility. Our role in the world of work means we have a real opportunity to make a positive difference to people’s lives, but it also means we must remain alert to the risks that can undermine dignity, freedom and fair treatment. Modern slavery and human trafficking are grave abuses of human rights, and they have no place in our business, our supply chains, or the wider labour markets in which we operate.

The Hays Way is how we live up to that responsibility. Everything we do is built on a foundation of trust and integrity, and the way we get things done matters as much as what we deliver. That means being open about the risks we face, and determined to keep strengthening the way we identify, prevent and respond to exploitation.

Modern slavery is not an abstract issue. It affects people, families and communities, and it can exist wherever individuals are vulnerable, isolated or without a voice.

As a global workforce solutions business centred on people, we recognise both the opportunity and the responsibility we have to help protect human rights and support responsible labour markets. When we act with integrity, ask the right questions and speak up early where something does not feel right, we help protect the trust placed in us by our clients, candidates, colleagues, workers, suppliers and communities.

Over the past year, we have continued to strengthen our approach to preventing modern slavery and human trafficking. We have enhanced our governance arrangements, deepened our understanding of risk across our operations and supply chains, and invested in the policies, training and partnerships that support continuous improvement. This work is a practical expression of the Hays Way: doing business openly, fairly and responsibly, and challenging ourselves to do better where we can.

Mark Dearnley

19th Aug 2026

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the ‘Act’), and describes the steps Hays has taken to prevent, detect and respond to modern slavery in our own business and throughout our supply chains. This statement was approved by the Board of Hays plc on [19th August 2026] and covers the period of 12 months ending on 30 June 2026. Hays seeks to meet all reporting requirements under the Modern Slavery Act 2015 and continuously reviews evolving legislation, government guidance and best practice to strengthen our approach. During FY26, we continued to enhance our modern slavery prevention programme in consultation internally and with Slave-Free Alliance (SFA).

Hays entities required to publish a Modern Slavery Statement and therefore covered by this Group Statement include: Hays Specialist Recruitment Limited.



Mark Dearnley
Chief Executive Officer
For and on behalf of Hays plc

FY26 at a glance

About Hays

Hays is a leading global specialist recruitment and workforce solutions business. As at 30 June 2026, we operated in 23 countries through approximately 155 offices worldwide, employing around 8,100 colleagues. Every year, we help millions of people access meaningful work and support organisations in solving complex workforce challenges across a broad range of industries and professional specialisms (Technology, Finance, Engineering, Construction & Property, Life Sciences and Human Resources). Our services include temporary, contract and permanent recruitment, as well as workforce solutions and talent management services for clients globally.

Because our business is centred on people and work, we recognise both the opportunity and the responsibility we have to promote responsible employment practices and respect for human rights. Our scale, global footprint and role in connecting clients, candidates, workers and suppliers across multiple labour markets mean that we must remain alert to the risk of modern slavery and human trafficking in our own operations, our supply chains and the services we provide. In line with the Hays Way, trust and integrity are the foundation of how we operate. We therefore continue to strengthen our governance, due diligence, training, reporting and risk management processes so that modern slavery risks are identified, assessed and addressed in a timely and responsible way.



FY26 Highlights



6,226 colleagues - 90% completion rate of modern slavery training for those required to complete the training globally



100% of Modern Slavery working group meetings had independent challenge and expertise as attended by SlaveFree Alliance (SFA)



Safecall expanded - reporting route now available to external stakeholders



Supplier risk assessment launched with **SFA**



Policy - New policy framework developed ready for an FY27 launch

Our approach *and culture*

The Hays Way sets out how we work and make decisions as a business. Everything we do is built on a foundation of trust and integrity, and the way we get things done matters as much as what we deliver. In the context of modern slavery prevention, this means being clear about the standards we expect of ourselves and our partners, recognising the risks that can arise across our operations and supply chains, and taking practical steps to identify, escalate and respond to concerns.

Our culture

As a business centred on people and work, we have responsibilities to our colleagues, candidates, clients, workers and suppliers. Our participation in the United Nations Global Compact, together with our commitment to the United Nations Sustainable Development Goals, supports our broader approach to responsible and sustainable business. These commitments are reflected in the controls, policies, training and reporting routes we use to help prevent modern slavery and human trafficking and to support respect for human rights, dignity and fair treatment.

Our culture is therefore central to our approach. A culture grounded in trust and integrity helps colleagues ask questions, raise concerns and act where something does not feel right. It also supports the way we work with clients, candidates, workers and suppliers to promote responsible business practices and reduce the risk of exploitation in the labour markets and supply chains connected to our business.

Our Valued Behaviours

Our vision is to be the global leader in recruitment and workforce solutions. We achieve this by truly understanding the needs of our candidates and clients, locally and globally, partnering with them to create positive impact. We want every colleague at Hays to feel connected to our business and empowered by the way we work together. Our Valued Behaviours guide how we behave every day, how we serve our customers, and how we contribute to the communities we're part of.

Be Bold and Curious

We're ambitious, push outside our comfort zone and experiment. We are flexible and open-minded. We experiment, fail-fast, learn and grow. It's about being prepared to innovate and take calculated risks. At the heart of this is knowing we may not always get it right, but how we learn, adapt and improve is key to our continued success. We continuously seek better ways to identify and address modern slavery risks.

Own the Outcomes

We strive for performance, see things through, and always act with integrity. We are clear on our vision for the future, believe in transparency and setting clear expectations for one another so we can perform at our best. It's not about working for work's sake; it's about making our efforts count. We are trusted to do what we say we will do. And we always act with good intent, treating everyone with respect and working to the highest ethical standards. We act with integrity, take accountability and strive for continuous improvement.

Be Better Together

We support, celebrate and share with each other to create stronger outcomes for all. We have a strong sense of community and fun, underpinned by a focus on inclusivity, collaboration and co-creation. When we win, we win together. We create the space for people to be their authentic selves and for everyone to have a voice, so we arrive at the best solutions. When we lift each other up, we all succeed. We recognise that collaboration is essential to identifying, preventing and responding to modern slavery.

Champion the Customer

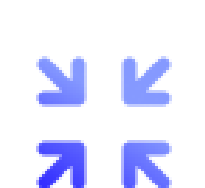
We proactively partner with our customers to build better, profitable solutions. We have a customer centric mindset where every colleague, regardless of role or location, is connected and focused on ensuring they deliver for their customer, whether that is an internal customer, a client or a candidate. We are outward-looking so we spot opportunities and anticipate change so we can deliver the best expert service. We work closely with clients, candidates, workers and suppliers to promote and exceed responsible business practices.



Strategy, structure *and* governance

During FY26, Hays launched Momentum, our strategy with our ambition to become **the world’s leading specialist recruitment and workforce solutions provider, pioneering the best of human and AI capability**. Momentum is designed to ensure that our consultants remain at the heart of matching candidates with opportunities, combining human expertise with technology to deliver the unique Hays Way.

Momentum is delivered through four strategic pillars:

-  **Grow to Specialism Leadership**
-  **Expert in All We Do**
-  **Unbeatable Matching**
-  **Powering Productivity**

As Hays continues to evolve through Momentum, our commitment to ethical business conduct, respect for human rights, and the prevention of modern slavery remains a fundamental part of how we operate. Trust, integrity and responsible business practices underpin each of our strategic priorities and support our ambition to create sustainable value for our clients, candidates, workers, suppliers and colleagues.

Preventing modern slavery requires a proactive and integrated approach across all aspects of our business. Through Momentum, we continue to strengthen the governance, controls and oversight that help us identify, assess and mitigate risks of exploitation. This includes maintaining robust candidate and contractor compliance processes, strong corporate governance arrangements, effective risk management practices, responsible use of technology and AI, and continued focus on sustainability and ethical business conduct.

By embedding modern slavery considerations into our broader business strategy, we aim to build organisational resilience, support responsible labour market practices, and help safeguard those who may be vulnerable to exploitation. We recognise that preventing modern slavery is an ongoing responsibility that requires continuous vigilance, collaboration and improvement.

Our Business Structure

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.

As of 30 June 2026, Hays had c.8,100 employees in 155 offices in 23 countries, structured around four key regions: UK & Ireland; Europe; APAC; and the Americas.



Governance

Our Board of Directors plays a crucial role in overseeing and assessing our approach to modern slavery, and in ensuring that our policies, procedures and controls are fit for purpose and aligned with our purpose, strategy and Valued Behaviours. During FY26, we reviewed our sustainability governance arrangements to strengthen executive ownership, simplify accountability and better connect delivery to strategy, risk management and reporting integrity.

We are moving towards a more streamlined sustainability governance framework, with the Sustainability Committee being repositioned from Board level to ELT level. Under the revised framework, the Board will retain overall responsibility for sustainability strategy and its alignment with the Group’s purpose, Valued Behaviours, culture and long-term strategy. The Audit & Risk Committee will oversee sustainability and ESG reporting, related assurance, and the controls and processes supporting ESG data and disclosures. Other Board Committees will consider sustainability-related matters where relevant to their respective remits.

This approach is intended to maintain clear Board-level accountability while embedding day-to-day responsibility for delivery, coordination and monitoring at executive level. Further information on Board Committees can be found in the Corporate Governance Report.

The Board is responsible for approving this statement. In FY27, we will strengthen regular reporting to the Board, Executive Leadership Team or relevant governance forum on modern slavery programme delivery, material risks, incidents, training completion and progress against priorities.

The Modern Slavery Working Group

The Modern Slavery Working Group meets to oversee programme delivery and monitoring, and includes regional representatives and Group representatives from Global Compliance & ESG, Procurement, Risk, and People & Culture. The Modern Slavery Working Group is overseen by the Director of Compliance and ESG and is attended by Slave-Free Alliance.

Our business

We are predominantly private sector-focused but also serve public sector clients in some markets. Our services range from contracting, temp and permanent recruitment to complex, integrated workforce and HR solutions. In addition to our core recruitment services, our business model has evolved to become increasingly embedded within our clients’ talent acquisition and workforce management activities, based on long-term workforce partnerships and outsourced solutions such as managed service provision.

We provide compliance, background screening and onboarding services, alongside broader workforce solutions. We also offer project services in areas such as technology and life sciences. Through our global Enterprise Solutions business, we support multinational clients and some of the world’s largest organisations.

Our supply chains

During FY26, Hays commenced a supply-chain risk assessment with SFA to assess the inherent modern slavery and human rights risks associated with its procurement categories and supplier countries. Once complete, the assessment will help Hays prioritise areas for further due diligence and develop proportionate recommendations based on both the severity of potential harm and Hays’ relationship with, and potential leverage over, relevant suppliers.

This work builds on a separate global risk assessment completed in FY25, which examined the countries and industry sectors in which Hays places or supplies workers. Together, the assessments are intended to provide a more complete view of risk across Hays’ workforce-solutions activities and procurement supply chain.



Policies and conduct

Our relationships with clients, candidates, colleagues, business partners, suppliers and the communities within which we operate are based upon respect for individuals and their human rights. Our policies form the basis of our approach to preventing Modern Slavery and Human Trafficking and are intended to be read together.

The following policies form the basis of our approach:

- Code of Ethics & Conduct
- Human Rights Statement
- Supplier Code of Conduct
- Raising Concerns at Work Policy
- Annual Modern Slavery Statement.

In FY26, we also refreshed our Supplier Code of Conduct, and developed a new Human Rights Policy, Modern Slavery Policy, Modern Slavery Escalation Procedure, and Modern Slavery Policy Guidance. We aim to publish these in FY27 following their formal approval by the Board.

Our Code of Ethics & Conduct

At Hays, all our colleagues are committed to our Code of Ethics & Conduct, which reflects the way we operate. Our Code is reviewed and updated annually and is communicated internally via our Global intranet. Under our Code, all our colleagues are expected to:

- Comply with all laws and regulations
- Act with integrity and honesty
- Treat people fairly and with courtesy and respect
- Be responsible and respect diversity

Our Code sets out our expectations that all our colleagues comply with laws relating to slavery and human trafficking and satisfy themselves that our suppliers have taken steps to ensure their own operations and supply chains are free from slavery and human trafficking practices whether in the UK or elsewhere.

Through our policies and procedures, we seek to establish consistent ethical standards across our organisation. Our Group policies, procedures and guidance are stored and available on the Group and local intranets. Hays commits to translating its policy set to the main languages of the countries in which we operate. This will improve accessibility of our policies. Additionally,

we endeavour to update these policies annually according to business movement and in line with International Standards. Our approach to mitigating modern slavery and human trafficking is supported by the following:

Human Rights Statement

Our [Human Rights Statement](#) is available to view on our website and describes the rights and freedoms that are most salient to our own operations, and our commitments to protecting human rights in line with the principles and guidance of the UN Universal Declaration of Human Rights, the core conventions of the International Labour Organization (ILO) and the UN Guiding Principles on Business and Human Rights.

Supplier Code of Conduct

For our suppliers and potential suppliers, conduct information is made available through our Global intranet, via our [Supplier Code of Conduct](#). We expect our suppliers and potential suppliers to aim for high standards and to operate in an ethical, legally compliant and professional manner by adhering to our Code. Our Code includes specific reference to slavery and human trafficking, and states that suppliers must take 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.



Raising Concerns at Work

Our Raising Concerns at Work policy encourages a strong speak up culture, so that our colleagues can freely raise their concerns. We recognise that our colleagues are in a unique position to spot the signs of potential modern slavery and to act to save someone from exploitation. We encourage all colleagues to immediately report any concerns about modern slavery to us, so that we can take steps to safeguard anyone that is in danger. Colleagues are encouraged to speak up via one of the following reporting channels:

- Report their concerns locally, via their designated Integrity Champion or Regional General Counsel.
- Email their concerns to our Global Compliance & ESG team at integrity@hays.com.
- Report their concerns via Safecall, our confidential reporting service.

Our Safecall service is accessible in over 100 languages by telephone or online 24 hours a day, 365 days a year. To the extent permitted under applicable law, colleagues may submit a report anonymously. The UK number is as follows: 0800 915 157 and further country specific numbers are available through our local and group intranets. Reports can also be submitted online via the Safecall website. Safecall’s callback function allows individuals to arrange a conversation at a time when they feel able to speak safely and confidentially

Other stakeholders, suppliers and external agencies can also report their concerns via our Safecall service, or directly to their local Hays contact, and / or using the integrity@hays.com email address.

Remediation

Where a concern indicates that a person may be at risk of exploitation, our priority is safeguarding and the welfare of the affected individual. We will assess the concern through our escalation process, involve appropriate internal and external specialists where needed, and seek to ensure that any response is informed by the needs, safety and rights of the affected person. Remediation may include referral to specialist support, engagement with clients or suppliers, corrective action plans, changes to controls or processes, and escalation where required. We do not tolerate retaliation against anyone who raises a concern in good faith.



Risk management *and due diligence*

We recognise that there is a risk of modern slavery and human trafficking in relation to:

Our own operations *and the recruitment of our colleagues*

The recruitment and placement *of candidates for our clients*

Our supply chains related to the *purchase of goods and services*

The placement of temporary *workers directly and indirectly*

Based on our FY25 operational risk assessment and FY26 supply-chain risk assessment activities, our areas of heightened exposure include temporary and contract labour placements, lower-skilled or lower-paid roles, workers who may be away from home or reliant on third parties, and activities in higher-risk sectors and geographies.

Risk assessment

Our ongoing FY26 supply-chain risk assessment is also examining procurement categories where factors such as labour intensity, subcontracting and limited visibility may increase risk. These findings and risk factors inform how we prioritise countries, sectors, worker populations and supplier categories for further due diligence, training, monitoring and escalation activity.

As part of our commitment to strengthen the identification and management of modern slavery risks in line with section 54 of the Act, in FY25 we undertook a comprehensive update to our risk assessment. This work aimed to deepen our understanding of our potential exposure across our global operations and to enhance our capacity to manage such risks effectively.

The risk assessment was conducted by the Modern Slavery Working Group in partnership with the SFA, with support from Internal Audit, and the Global Compliance and ESG team. Sources used to inform the risk assessment included:

- Hays’ internal data on countries, fees and specialisms
- ITUC Global Rights Index
- Freedom in the World Index
- Global Slavery Index
- US Trafficking in Persons Report
- Human Development Index

The project involved detailed data analysis, the development of a multi-dimensional risk framework, and structured consultation with country leadership teams. The assessment enabled Hays to identify and prioritise areas of heightened exposure to modern slavery and human rights risks.

The development of this enhanced risk assessment tool reflects our commitment to continuous improvement and to embedding data-driven insights into our global human rights due diligence processes. The outputs of the risk assessment are being used to prioritise countries, sectors, supplier categories and worker populations for further review. This includes informing targeted due diligence, training, supplier engagement, escalation procedures and proactive data-led monitoring. The assessment will be reviewed and updated regularly to reflect evolving risks, operational changes and developments in our business model.

Having understood our operational risks, in FY26 Hays and SFA commenced development of a separate risk assessment focused specifically on the supply chain.

This will strengthen visibility of modern slavery and human rights risks across our supplier base and help us prioritise proportionate, risk-based due diligence. Where higher-risk suppliers or categories are identified, this may include enhanced monitoring, targeted engagement and the use of Hays' leverage to address identified gaps and improve outcomes for workers.

Risk management and due diligence

We have controls in place to mitigate the risk of modern slavery and human trafficking, including:

- Our policies and procedures (see section ‘Our policies and conduct’).
- Ensuring our contracts of employment and contracts for temporary workers comply with relevant local laws and that individuals are entitled to written contracts of employment, and rights in relation to hours, pay and termination of their contract.
- Policies and controls for conducting background checks on colleagues and candidates (including the assessment of their identity and their right to work before their employment or placement commences).
- Prohibition of charging direct or indirect fees to obtain employment.

Hays recognises that our worker data may contain information which is indicative of exploitation. For example, where multiple candidates are linked to the same domestic address, or where bank account or contact information are shared between multiple persons, this may suggest that potentially exploitative practices are occurring. In our UK&I business, Hays has developed a clear process which enables this information to be searched in respect of our own temporary workers, to identify any duplicated instances, and prevents key data being shared. Where adverse information is found, an investigation is commenced which considers the validity and scale of the concern, as well any immediate safeguarding considerations for the impacted person/s.

We seek to foster long-term relationships with our key suppliers, and we expect all our suppliers to comply with our Supplier Code of Conduct. In FY26 we developed a formalised response process for dealing with concerns raised (our Modern Slavery Escalation Procedure) that enables an investigation to take place and considers potential safeguarding considerations. This enables for a proportionate response to the issues, with worker welfare at the centre. See ‘Remediation’ above for further information on our approach.

Given the regional nature of our global business, our supplier relationships are generally managed at a local level, whereby appropriate governance controls form part of our local procedures, including contractual and financial management. These controls are subject to review and compliance checks by our Internal Audit team, who schedule checks depending on risk, performance, regularity and Group coverage.

Identified incidents – FY26 (Global)

During FY26, our proactive employee data checks identified three individuals linked to the same residential address. Shared accommodation is common and does not in itself indicate exploitation. However, where several workers share an address, it can indicate potential vulnerability or dependency on a third party and was therefore treated as a potential safeguarding indicator requiring further review.

The concern was escalated and welfare calls were conducted with the individuals concerned. They confirmed that the living arrangement was voluntary and were able to speak freely, with no immediate concerns identified regarding their welfare or living conditions.

The case reinforced the importance of assessing data indicators in context and demonstrated the value of proportionate enquiry where potential indicators of exploitation are identified. It also provided an opportunity to test and strengthen our data-led monitoring, escalation and safeguarding approach, and to identify opportunities for further improvement in how potential modern slavery indicators are assessed and managed.



Training *and* awareness

Raising awareness of modern slavery and human trafficking, both within our own operations, and within our supply chains, is a critical part of our overall risk mitigation strategy. We recognise the importance of providing training to our colleagues and stakeholders, so they have the capacity to identify and report any potential indicators or cases of modern slavery.

In FY26 we:

- Rolled out annual global modern slavery training, which was developed with support from the SFA. The training covers important topics including (i) what modern slavery is and who it affects, (ii) where our own operations and supply chains are at greatest risk, (iii) the indicators to look out for, and (iv) what to do if concerns are identified. Completion tracking is in place to monitor reach across our colleagues.
 - Helped shape and participated in supplier engagement sessions on modern slavery for a key client.
 - Arranged for SFA to present to our managed service provision agencies in the UK&I on (i) modern slavery in the UK, (ii) global trends, (iii) relevant human rights due diligence legislation, and (iv) how businesses are implicated. This was attended by a total of 127 individuals (27 Hays colleagues and 100 external stakeholders).
 - Supported Anti-Slavery Week with initiatives in our own business and on our social media. As part of Modern Slavery Awareness Week, Hays delivered a regional awareness campaign aimed at strengthening understanding of modern slavery risks and reinforcing our commitment to protecting human rights across our operations and supply chains. A range of educational resources were developed and shared across Europe, including webinar materials, awareness posters, presentations and an interactive quiz designed to engage colleagues and test their understanding of modern slavery indicators and reporting channels. These resources helped colleagues better recognise potential risks and understand their role in identifying and escalating concerns.
- By combining education with colleague engagement, the initiative supported Hays' ongoing efforts to foster a culture of vigilance, responsibility and respect for human rights across the organisation.
- Participated in the SFA annual conference and supported SFA with engagement and reach by providing testimonials on the advantages of our partnership with them.



Measuring Effectiveness

and FY27 priorities

We assess the effectiveness of our modern slavery prevention programme through a combination of governance oversight, training completion data, reporting and escalation trends, risk assessment outputs, supplier due diligence activity, policy implementation progress and lessons learned from any concerns or incidents raised.

In our FY25 Modern Slavery Statement, we committed to a number of specific objectives designed to strengthen our approach to preventing, identifying and responding to modern slavery risks across our operations and supply chains. These commitments focused on enhanced supplier due diligence, colleague training and awareness, and strengthening supplier compliance with our ethical standards:



FY25 commitment	FY26 progress	Status	FY27 next step
High-risk suppliers to complete EcoVadis assessments.	Transition to EcoVadis commenced; 33 of the top 40 suppliers by spend assessed; supplier modern slavery risk methodology still in progress.	Partially complete / in progress.	Complete supplier risk categorisation and apply enhanced due diligence to higher-risk suppliers.
Colleagues to receive modern slavery training.	6,126 colleagues completed the new global training programme, representing a 90% global completion rate.	Substantially complete.	Improve completion in lower-completion regions and monitor effectiveness beyond completion rates.
High-risk suppliers to sign the Supplier Code of Conduct or equivalent standards.	Refreshed global Supplier Code of Conduct developed following consultation; formal approval and signatory monitoring to follow in FY27.	In progress.	Embed the Code into onboarding and contract processes and monitor supplier acceptance.

During FY26, we made meaningful progress against these objectives. Through the work of our Modern Slavery Working Group and our ongoing partnership with the Slave-Free Alliance, we also recognise that addressing modern slavery requires a sustained programme of continuous improvement rather than a series of standalone annual targets. As our programme has matured, we have therefore transitioned from a predominantly annual objective-based approach to a longer-term performance roadmap, supported by ongoing monitoring, governance and annual public reporting on progress, challenges and future priorities. This approach enables us to maintain accountability whilst ensuring our efforts remain responsive to emerging risks, regulatory developments and evolving best practice.

Due Diligence and Responsible Procurement

In FY25, we committed that 100% of suppliers identified as high risk would complete an EcoVadis assessment by the end of FY26. During FY26, we commenced the transition to EcoVadis as part of our broader responsible procurement programme and, by year-end, 33 of our top 40 suppliers by spend had undergone an EcoVadis assessment. We also strengthened our sustainability performance and elevated our EcoVadis rating from “Committed” to Bronze during the year.

This represents important progress in strengthening our responsible procurement and supplier due diligence capability. However, because our supplier modern slavery risk assessment was still in progress at year-end, we are not yet able to confirm whether the original objective - that all suppliers identified as high risk complete an EcoVadis assessment - has been fully achieved. In practice, the work undertaken during FY26 has helped clarify the need for a more robust, globally consistent methodology for identifying and categorising supplier risk before applying enhanced due diligence requirements. Completing that methodology, categorising suppliers by modern slavery risk and applying proportionate due diligence to higher-risk suppliers will be a key priority for FY27.

Training and Awareness

We committed to ensuring that colleagues received training on how to recognise the signs of modern slavery and respond appropriately to concerns. During FY26, Hays successfully launched and rolled out a new global modern slavery training programme, developed in collaboration with Slave-Free Alliance and aligned to the action plan created by the Modern Slavery Working Group.

Globally, 6,813 employees were required to complete the training during FY26, with 6,126 completing it, representing a 90% global completion rate. This was a strong year-one outcome for a newly launched global programme and provided colleagues across the Group with practical guidance on modern slavery risks, key indicators, reporting routes and appropriate response steps. Completion rates reached 96.6% within GSC operations, 93% in APAC, 91% in the United States and 80% across EMEA.

Although the original objective of full completion was not fully achieved in FY26, the programme strengthened the foundations for colleague awareness and capability, supported by increased reporting to Group Compliance following launch. We view this as an indicator of improved awareness and greater confidence in raising concerns, rather than evidence of an increase in underlying modern slavery activity. In FY27, we will continue to assess training

effectiveness not only through completion rates, but also through regional completion trends, concern reporting patterns, colleague feedback and the quality and timeliness of escalations received.



Policy and Compliance

In FY25, we committed that all suppliers identified as high risk would sign the Hays Supplier Code of Conduct, or equivalent standards, by the end of FY26. During FY26, we completed the development of our refreshed global Supplier Code of Conduct following an extended consultation and drafting process. The Code strengthens our supplier expectations on ethical business conduct, labour standards, human rights and modern slavery prevention, and is intended to provide a clearer foundation for supplier onboarding, engagement and compliance monitoring.

Because the refreshed Code will be formally approved in FY27, supplier signatory data was not available at year-end and we are not yet able to confirm whether the original objective has been fully achieved. However, the work completed during the year was an important step in strengthening our policy framework and preparing for more consistent supplier implementation. In FY27, we will embed the refreshed Supplier Code of Conduct into supplier onboarding and contract processes, monitor supplier acceptance, and use our supplier risk assessment methodology to prioritise engagement and compliance monitoring for higher-risk suppliers.

Moving from Annual Targets to Continuous Improvement

While annual KPIs continue to play an important role in driving accountability, experience has demonstrated that preventing modern slavery is most effectively managed through a programme of ongoing enhancement rather than fixed year-end milestones alone. Accordingly, Hays has adopted a longer-term roadmap approach, overseen by the Modern Slavery Working Group and supported by regular governance and performance reporting.

Through this approach, future reporting will focus not only on whether individual targets have been achieved, but also on the maturity, effectiveness and continuous improvement of our modern slavery framework.

Future priorities

As part of our ongoing commitment to preventing modern slavery and protecting human rights, Hays will continue to strengthen its programme through the following priority activities:

Risk assessment and due diligence:

By FY30 we aim to:

- Complete the supplier modern slavery risk assessment and categorise 100% of suppliers by risk level.
- Ensure 100% of suppliers assessed as high risk are subject to enhanced due diligence.

- Increase year-on-year the proportion of in-scope suppliers completing an EcoVadis assessment (or equivalent) year-on-year

Policies and escalation:

By FY30 we aim to:

- Publish and embed the updated Supplier Code of Conduct, and new Human Rights Policy, Modern Slavery Policy, Modern Slavery Policy Guidance and Modern Slavery Escalation Procedure.
- Ensure key policies and guidance are available in relevant local languages across major operating regions.
- Monitor and report annually on the number of concerns raised, investigated and resolved through modern slavery escalation channels.

Training and awareness:

By FY30 we aim to:

- Achieve and maintain 95%+ annual completion rate for mandatory modern slavery training among required colleague populations.
- Deliver at least one annual awareness campaign across major operating regions using targeted communications and local leadership engagement to reinforce indicators, reporting routes and safeguarding expectations.

Governance and monitoring:

By FY30 we aim to:

- Provide at least Bi-annual reporting on modern slavery programme performance to the Board, Executive Leadership Team, or designated governance forum.
- Maintain independent review and challenge of the programme through ongoing engagement with Slave-Free Alliance or an equivalent specialist partner.

Demonstrate year-on-year improvement across key programme indicators, including supplier due diligence coverage, policy implementation, training completion and risk management outcomes. Through these actions, Hays remains committed to continuously enhancing its approach to preventing modern slavery, recognising that meaningful progress requires sustained focus, collaboration and ongoing improvement across all aspects of our business and supply chain.



