

Modern Slavery & *Human Trafficking* *Statement*

FY2025

HAYS



Introduction

from our CEO

Slavery and human trafficking are human rights abuses and have no place in our business or in our supply chains. In line with our vision and our valued behaviours, we aspire to operate our business responsibly and in line with the highest standards of conduct.

At Hays, we do not accept complacency. As a global workforce partner, people are at the heart of what we do. We recognise the influence we hold and the responsibility that comes with it. We are committed to using that influence to drive meaningful change - within our own operations, across our supply chains, and throughout the wider workforce solutions sector.

This statement sets out the steps we've taken over the past year to strengthen our defences against modern slavery and human trafficking. But more than that, it

reflects our commitment to transparency, accountability, and continuous improvement. We don't want to just meet the expectations placed on us - we want to raise them.

We know that tackling modern slavery demands vigilance, collaboration, and a willingness to challenge ourselves and others. That's why we continue to work closely with our partners, suppliers, clients, and stakeholders to seek high standards of conduct across all aspects of our operations.

Dirk Hahn

19th Aug 2025

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 2025 and covers the period of 12 months ending on 30 June 2025.

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



Dirk Hahn
Chief Executive Officer
For and on behalf of Hays plc

Our key achievements *in FY25*

We recognise the importance of continuous improvement of our modern slavery prevention programme.

In FY25 we:

- Committed to a new 3-year partnership with Slave-Free Alliance (SFA), an international social enterprise, wholly owned by the global anti-slavery charity Hope for Justice.
- Reviewed the latest UK government guidance on Transparency in Supply Chains, published in March 2025, and amended our statement to that effect.
- Discussed progress of our modern slavery prevention programme at the Sustainability Committee, our Board Committee with responsibility for oversight of modern slavery and human trafficking. The SFA has been invited to attend this Committee during FY26.
- Evolved the membership of our Modern Slavery Working Group, to ensure it is targeted to drive and address the recommendations made by the SFA Gap Analysis.
- Completed a documented risk review of our business, to ensure our programme prioritises the countries, specialisms and suppliers within our operations which have the highest risk of modern slavery.
- Developed and communicated new guidance on our modern slavery prevention programme, and updated our modern slavery training, to be rolled-out globally in FY26.
- Targeted increasing our visibility and effective management of our supply chain risks, by committing to a new partnership with EcoVadis.
- Established a new global ethics and integrity function, headed by a Group Compliance Officer, with responsibility for embedding ethical business conduct and integrity throughout our business and supply chains.
- Appointed a global network of 'Integrity Champions', with responsibility for embedding responsible and ethical business conduct and integrity in each of our markets.
- Established a global procurement function, headed by a new Technology Procurement Director, with a focus on embedding responsible procurement practices across our global supply chains.
- Commenced development of a new Group Modern Slavery Policy and modern slavery incident escalation procedure.
- Updated our worker onboarding checks in our UK&I region, to ensure enhanced monitoring of red flags for temporary workers, and sought advice on a best practice approach to welfare calls.

“Hays has demonstrated a genuine desire to identify, mitigate, and crucially, respond to potential instances of modern slavery, in their own workforce and supply chain. We are collaborating with Hays on a business- wide risk assessment, which plays an important part in identifying where risks are most likely to be apparent and enabling efforts to have the greatest impact.

Another key exercise has been the development of a response plan to ensure that any incident is handled sensitively, proportionally, and when necessary, referred to the relevant organisations, to support the impacted person. This ensures that victims receive the appropriate care, and in a timely manner.”

Tom Frost

Slave-Free Alliance - Senior Advisor
on Human Rights in Supply Chains



Our approach

As a business with people at its core, we recognise we have an important responsibility to our colleagues, candidates, clients and workers in our supply chains to prevent modern slavery and human trafficking, and a unique opportunity to positively contribute as a global organisation and through our role in the world of work. We are committed to sustainability in its widest sense, as defined by the United Nations Sustainable Development Goals (UN SDGs) and our participation in the United Nations Global Compact, which together form the foundation of how we work at Hays.

Our culture

We believe that a positive culture, anchored in our valued behaviours, is fundamental to our success as a responsible and sustainable business. We are focused on creating and maintaining a culture where people want to work, where they can play their part in delivery of Hays’ strategy and success, where they can grow their careers and flourish, and where they can have a positive impact on our clients, candidates and the communities we are part of.

As a people-centric organisation, it is the power of the collective contributions of our teams that helps us continue to make a difference to people and organisations around the world.

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.

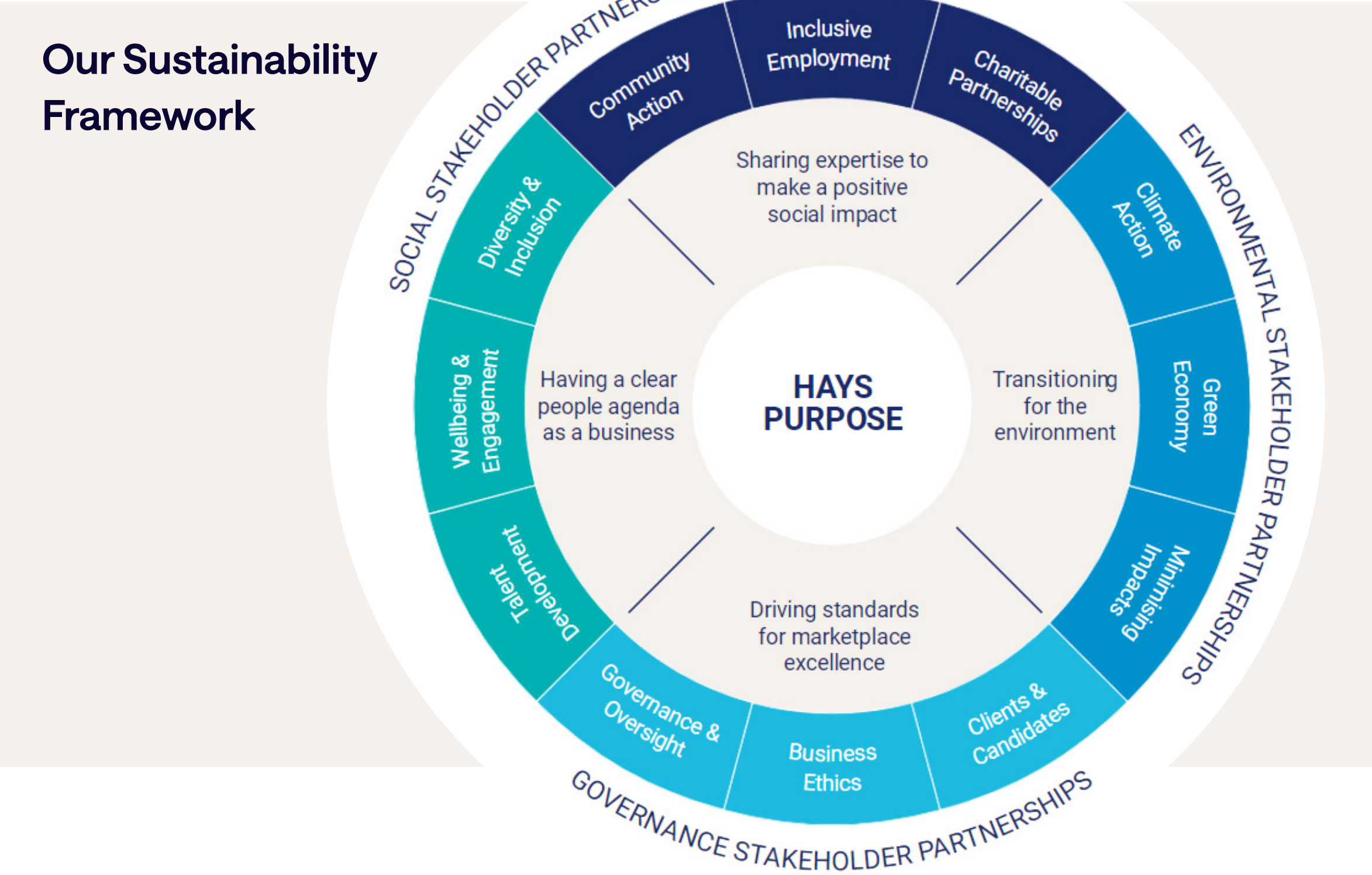
Our valued behaviours are:

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.

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.

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.

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.



Our business, organisational structure and supply chains

Our business

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 at 30 June 2025, Hays had c.9,500 employees in 211 offices in 31 countries, structured around four key regions: UK & Ireland; Germany; Australia & New Zealand; and the Rest of World.



Our consultants work across a broad range of industries, covering recruitment in 21 professional and skilled specialisms. Our four largest specialisms are technology, accountancy & finance, engineering and construction & property.

We are predominantly private sector-focused, but also serve public sector clients in some markets. Our services range from contracting, temp and permanent role recruitment to complex, integrated HR solutions. 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 also offer project services in areas such as technology and life sciences. We work with clients with international reach through our global Enterprise Solutions business, serving some of the largest organisations in the world.

Governance

As a public limited company (PLC), Hays has a Board comprised of executive and non-executive directors. The Board is collectively responsible for setting the Group’s strategic objectives, and 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.

We have a PLC Board level Sustainability Committee, whose oversight includes the activities of the Modern Slavery Working Group. The Modern Slavery Working Group meets every six weeks and includes representation from core functions including Sustainability, Ethics and Integrity, People & Culture, Legal, Technology, Operations, Risk & Compliance.

The Executive Leadership Team, chaired by the Chief Executive Officer, is responsible for the day-to-day management of the Hays business and our operations.



[Find our Governance Framework here ▶](#)

Our supply chains

In the operation of our global business, candidates may be introduced to us by external agencies prior to their 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.

We also procure a variety of goods and services, including:



Offices



Financial, legal and other consultancy services



Catering and food



Banking services



IT, telecoms and tech



Facilities management, energy and utilities;



Cleaning services



Office furniture



Office equipment and consumables



Marketing



Business travel and accommodation

We aim to maintain close relationships with our suppliers and ensure good visibility across our supply chain. However, given the global nature of our operations, some gaps in visibility, particularly across tiers 2, 3 and beyond, are inevitable.

To help mitigate this, we expect our tier 1 suppliers and prospective suppliers to uphold high ethical standards and to operate in a legally-compliant, professional, and responsible manner, in line with our [Supplier Code of Conduct](#). We also encourage them to promote similar standards throughout their own supply chains.

To read more about our business, please click here. ▶



Our 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.

At Hays, all our colleagues are committed to our **Code of Conduct and Ethics Policy** (our ‘**Code**’), 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 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.

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 of Business and Human Rights.

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 Group Compliance Officer 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.

Other stakeholders can report concerns to their local Hays contact and / or using the integrity@hays.com email address.

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 [Supplier Code of Conduct](#). Our Supplier Code of Conduct 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.

In FY25, the SFA provided us with some policy best practice guidance, that was aligned to the UN Global Compact. In FY26, we will complete the refresh of our policies relating to modern slavery, to ensure alignment. These policies will be translated into multiple languages, for ease of access.



Risk assessment *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*

We further recognise there is a higher risk of modern slavery where workers are in lower skilled employment, away from home and / or working in temporary positions, and that modern slavery and human trafficking risk is more prevalent in certain sectors and certain geographies.

Risk assessment

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, the Head of Sustainability, and the Group Compliance Officer. 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, embedding data-driven insights into our global human rights due diligence processes. The results of the risk assessment will be used to inform targeted due diligence, strengthen our internal controls and worker safeguards, and to conduct proactive monitoring of emerging risks. The assessment will be reviewed and updated regularly to reflect evolving risks, operational changes, and developments in our business model.



Risk management and due diligence

Our valued behaviours, together with our **Code of Ethics and Conduct** and *Supplier Code of Conduct*, form our framework for responsible business practices. We have controls in place to mitigate the risk of modern slavery and human trafficking, including:

- 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 of our suppliers to comply with our **Supplier Code of Conduct**.

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.

Should Hays discover that any human rights of our colleagues or workers within our supply chain have been compromised, we will collaborate with appropriate agencies to implement remediation measures. The measures will consider the needs and requirements of the impacted persons, whilst also ensuring that further abuses do not occur.

Identified incidents – FY25 (Global)

This year, an issue was identified with an external agency in the UK that highlighted some gaps in their employee document verification and onboarding processes. This was discussed within the Hays Modern Slavery Working Group and the SFA, and has resulted in the following steps:

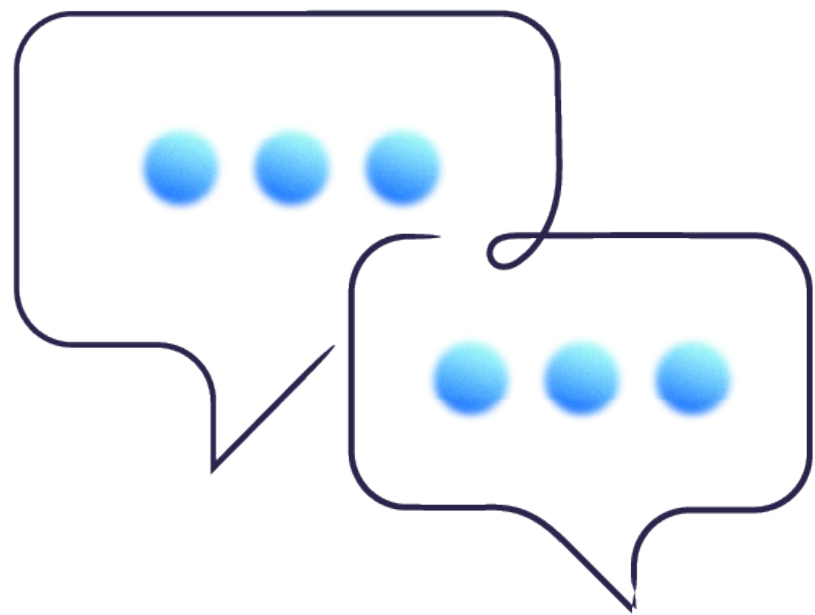
- Enquiries with the client and agency, to ensure the needs and requirements of the individual concerned were being appropriately met.
- A review of our own internal controls, to identify areas for improvement in our procedures.
- The development of a documented remediation plan with the external agency.
- Conducting additional auditing of the external agency.



Awareness raising *and* capacity building

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 FY25 we:

- Worked with the SFA to develop a new training module for colleagues. The training covers important topics including (i) what is modern slavery and who does it affect, (ii) where our own operations and supply chains are at greatest risk, (iii) the indicators to look out for, and (iv) what to do in the event that concerns are identified. The new module will be rolled out to all colleagues in FY26.
- Developed a dedicated global resource site on modern slavery for all colleagues, which includes guidance on how to spot the signs of modern slavery, and our procedures for reporting concerns. This new resource was publicised in our global newsletter.
- Supported Anti-Slavery Week on our social media.
- Participated in the SFA annual conference, and supported SFA with engagement and reach by providing testimonials on the advantages of our partnership with them.
- Helped shape and participated in supplier engagement sessions on modern slavery for a key client and secured SFA to present on (i) modern slavery in the UK, (ii) global trends, (iii) relevant human rights due diligence legislation, and (iv) how businesses are implicated.



Case study – collaboration against modern slavery (UK)

The respect of human rights is something which can be more effectively addressed through collaboration. In the UK we have been collaborating to raise awareness and stimulate action.

This has included co-creation and delivery of a supplier engagement session, convened by one of our key clients, who are a global tech business, to stimulate debate and provide a forum for their suppliers to discuss challenges and working practices, relevant to mitigating modern slavery risk.

The session was supported by the Slave-Free Alliance, at the invitation of Hays, to explain clearly what Modern Slavery is, the scale of the issue and provide latest insights and general context.

Hays colleagues prepared to share their experience of collaborating with the Slave-Free Alliance and how the partnership had sharpened focus on improvement opportunities.

The client’s Technical Services Category Lead said:

“I would like to express our sincere gratitude for embracing our idea and helping us make it real to co-host together a UK Modern Slavery Awareness Session. The subject of Modern Slavery is very important and is presenting an organisation at its very best when one can demonstrate continuous efforts in the field. I believe, the relationship between Hays and my company, is an example of a real partnership, where actions and initiatives go beyond the standard business needs.”

There has been further collaboration with other industry players, key client and construction business ‘Kier’ and the award-winning anti-slavery charity ‘Unseen’. In this instance, we contributed to a video designed to help raise awareness of modern slavery risk, particularly in relation to construction. The film can be accessed [here](#).

Impact *and monitoring*

During FY26, we will monitor and report on the following metrics and measures of success:

Target date	Category	Target	Measure
By end of FY26	Due diligence	100% of ‘high-risk’ suppliers to have completed an EcoVadis assessment	Number and category of suppliers completing EcoVadis assessments
By end of FY26	Training and awareness	100% of colleagues trained on how to spot the signs of modern slavery	No. of colleagues trained on modern slavery
By end of FY26	Policy and compliance	100% of ‘high risk’ suppliers to have signed the Hays Supplier Code of Conduct or equivalent	Number and category of suppliers who have signed the Hays Supplier Code of Conduct or equivalent



Plans for *FY26*

During the course of the next 12 months we will continue to strengthen our approach to managing and mitigating the risk of modern slavery and human trafficking within our own business and in our supply chains.

Due diligence and risk mitigation

- Commence our engagement with EcoVadis to conduct supplier assessments and map our supply chains.

Training and capacity building

- Roll out our new modern slavery training module to all colleagues.
- Develop and roll-out supplier awareness events for our key suppliers.

Policy and compliance

- Finalise the design and cascade our Modern Slavery Policy.
- Finalise the development of our escalation process, for use upon the identification of a potential modern slavery incident within our own operations or within our supply chains.

Governance and strategy

- Continue to work with the SFA to ensure continuous improvement of our modern slavery prevention programme.
- Implement our developed action plan to increase our EcoVadis ESG assessment score.
- Develop a targeted roadmap / action plan to specifically address the risks identified as part of our risk mapping.

