

## **Corporate Offences Policy (Australia)**

Robert Half reserves the right to cancel or to suspend this policy or its application at any time and whether in whole or in part. This policy does not create enforceable rights in favour of Robert Half staff or third parties nor can Robert Half staff or third parties claim compensation in case of infringement. This policy shall not form part of or otherwise be incorporated into a staff member's or third party's contract or otherwise have contractual effect. In the event of a conflict with the law, the law prevails.

## Corporate Offences Policy (Australia)

---

### Policy Statement

Robert Half Australia Pty Ltd (“**Robert Half/we/us/our**”) operates a strict no tolerance policy towards modern slavery.

1. Robert Half is committed to acting ethically and with integrity in its operations and in all its business dealings and relationships and implementing and enforcing effective systems and controls to ensure modern slavery is not taking place within its Australia business operations and supply chains.

### Who is covered by the Policy?

2. This policy applies to all persons working for Robert Half or on its behalf in any capacity, including employees at all levels, directors and officers (“**Staff**”).
3. The policy also applies to our business relationships with our clients, suppliers, service providers and other third parties including agency workers, seconded workers, volunteers, interns, agents, contractors and external consultants (“**Third Parties**”).

### Purpose of the Policy

4. The purpose of this policy is to set out our responsibilities as well as the responsibilities of our Staff and Third Parties, in observing and upholding our position on bribery, modern slavery and tax evasion.

### 6 Modern Slavery

6.1 Modern slavery is a crime and a violation of fundamental human rights.

6.2 Robert Half recognises modern slavery takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

6.3 Robert Half is committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout its operations and supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2018 (**the Act**). Robert Half expects the same high standards from all its Third Parties. As part of Robert Half's contracting processes, it expects that its Third Parties will hold their own clients, suppliers, service providers, officers, employees and other third parties to the same standards set out in this policy.

6.4 Procurement - All managers who are responsible for procurement of goods and / or services must ensure that this policy and Robert Half's zero-tolerance approach to modern slavery is communicated to all Third Parties during the procurement process and / or at the outset of each business relationship, including suppliers of goods and services. Robert Half expects that all Third Parties will:

- identify, assess and disclose to Robert Half any actual or potential occurrence of modern slavery within their own operations or supply chain;
- establish appropriate systems to ensure that they act in a manner which is consistent with the Act and this policy;
- comply with all applicable laws, including employment and labour laws;
- adopt a similar policy to this policy which incorporates provisions for the identification and eradication of modern slavery risks;
- hold their own clients, suppliers, service providers, officers, employees and other third parties to the same standards set out in this policy; and

## Corporate Offences Policy (Australia)

---

- complete any relevant checklist or questionnaire regarding modern slavery.

6.5 Managers are responsible for ensuring that all relevant existing Third Party contracts include obligations to comply with the Act and any new Third Party contracts contain applicable prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. Managers are responsible for ensuring that a Third Party completes and returns to Robert Half any checklist or questionnaire relevant to modern slavery. Managers may utilise the Template Letter in Schedule 1 for amending existing contracts and Template Contract Clauses in Schedule 2 for inclusion in all new contracts entered in to following the launch of this policy.

### Responsibilities and Monitoring

- 7 All Staff and Third Parties (as applicable) must read, understand and comply with this policy and are required to comply with this policy (as applicable) and avoid any activity that might lead to, or suggest, a breach or potential breach of this policy.
- 8 The prevention, detection and reporting of bribery, modern slavery, the facilitation of tax evasion and other forms of corruption are the responsibility of all those working for Robert Half or working under the control, supervision or direction of Robert Half.
- 9 Management at all levels are responsible for:
- ensuring that those reporting to them are made aware of, understand and comply with this policy and their responsibilities under this policy;
  - monitoring the use and effectiveness of this policy;
  - dealing with any queries about it;
  - responding appropriately to any issues or risks reported to them; and
  - auditing internal departmental control systems and procedures to ensure they are effective in countering corporate offences set out in this policy.
- 10 The board of directors has overall responsibility for ensuring this policy complies with Robert Half's legal and ethical obligations, and that all those Staff and Third Parties under its control comply with it.

### Sanctions & Disciplinary Action

- 11 Staff are required to comply with all applicable Robert Half policies including this policy at all times. Staff that are found to be in breach of this policy or any other applicable Robert Half policies may be dealt with in accordance with the local country Disciplinary Procedure and laws and in serious cases may be subjected to disciplinary action up to and including the possible termination of their employment.
- 12 Any non-compliance with this policy by a Third Party will be regarded as a breach of contract and may result in the requirement to take corrective action and the suspension or termination of the contractual relationship.
- 13 Any non-compliance with this policy by a Third party must be promptly notified to us in writing and Robert Half requires all Third Parties to cooperate fully in any investigations, requests for information or related processes initiated by Robert Half.
- 14 It is important to note that modern slavery is a criminal offence in Australia and an individual may also face criminal penalties.

### Training and Communication

## Corporate Offences Policy (Australia)

---

- 15 Training on this policy forms part of the induction process for all new Staff. Staff will receive regular reminders on how to implement and adhere to this policy. Robert Half's zero-tolerance approach to modern slavery must be communicated to our Third Parties at the outset of our business relationship with them and as appropriate thereafter.
- 16 Robert Half expects that all Third Parties will provide appropriate training on modern slavery or the Act.

### Raising Concerns and Seeking Guidance

- 17 If any Staff believe or suspect a breach of this policy has occurred or that it may occur or are concerned about connected issues or suspicions of malpractice they must promptly, at the earlier opportunity in writing either notify a Director or the Robert Half International Inc ("RHI") Legal Dept), or act in accordance with the RHI [Code of Business Conduct and Ethics](#) and the sections "**Monitoring and Reporting of Illegal or Unethical Behavior**" and "**Compliance Procedures**" which provide details of who they should contact if they have any concerns or doubts as to whether a potential act constitutes a corporate offence as set out in this policy. If any Third Party believes or suspects a breach of this policy has occurred or that it may occur, they must promptly notify their Robert Half point of contact or the Managing Director in writing.
- 18 If any Staff or Third Parties are unsure about whether a particular act is a breach of this policy, they must contact their Robert Half point of contact or Managing Director to discuss any concerns or doubts they may have.
- 19 Robert Half encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Robert Half is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that a corporate offence is or may be taking place. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any Staff believe they have suffered any such treatment, the individual should inform either their manager or the HR Department immediately. If the matter is not remedied, a member of Staff should raise it formally in accordance with the local Grievance Procedure, which is published on the local intranet.

### Review of the Policy

- 20 The RHI Legal Department has overall responsibility for this policy.
- 21 This policy was last updated on: **March 21, 2021**.

---

**SCHEDULE 1*****TEMPLATE LETTER for use with suppliers where the contract does not contain a requirement to comply with the Modern Slavery Act 2018.*****TO BE TYPED ON RH LETTERHEAD**

Dear Supplier

**Modern Slavery Act 2018**

You are no doubt aware of the Modern Slavery Act 2018 (Act), under which companies who meet the threshold are required to implement and enforce effective systems and controls to ensure modern slavery is not taking place in their operations or in any of its supply chains.

We have a zero-tolerance approach to modern slavery, which is a crime and a violation of fundamental human rights. We recognise this takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships with suppliers.

If you supply goods or services to us, you agree to do so as set out below:

- Not engage in any conduct or omission which may contravene (and you shall ensure that your own clients, suppliers, service providers, officers, employees and other third parties including sub-contractors comply with) the Modern Slavery Act 2018 or the Robert Half Anti-Slavery Policy (as amended from time to time). A copy of this policy is available upon request.
- You also undertake, warrant and represent that you shall implement appropriate due diligence procedures for your own clients, service providers, suppliers, sub-contractors and other participants in your supply chains to ensure that there is no modern slavery or human trafficking in its operations and supply chains.
- You agree to notify us and confirm the same promptly in writing upon discovering any breach or potential breach of the Modern Slavery Act or any actual or suspected slavery or human trafficking in your operations and/or supply chains.
- Any non-compliance with the Modern Slavery Act or Robert Half's Policy will be regarded as a breach of contract and may result in the requirement to take corrective action and the suspension or termination of the contractual relationship. Any non-compliance or potential non-compliance must be promptly notified to us in writing and Robert Half may require you to cooperate fully in any investigations, requests for information or related processes initiated by Robert Half.

Please confirm your agreement to the above, in addition to any other terms and conditions agreed between the parties, by signing and returning a copy of this letter.

Yours faithfully

**Con Logothetis, Director**  
**Robert Half Australia Pty Ltd**



Corporate Offences Policy (Australia)

---

I agree to the above terms relating to the Modern Slavery Act 2018, in the event we supply goods and/or services.

Signature: .....  
Authorised signatory

Print Name: .....

Position: .....

Company: .....

**SCHEDULE 2****TEMPLATE CONTRACT CLAUSES to be included in all Australia Goods and/or Services Contracts**

**NOTE:** *The clauses can be re-numbered and the terminology changed to reflect the language used in the applicable contract.*

**1. COMPLIANCE WITH ANTI-SLAVERY AND HUMAN TRAFFICKING LAWS**

- 1.1 In performing its obligations under the agreement, the [Supplier] shall:
- 1.1.1 comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2018; and have and maintain throughout the term of this agreement its own policies and procedures to ensure its compliance;
  - 1.1.2 comply with applicable policies, including the Robert Half Policy relating to modern slavery, as it is amended from time to time;
  - 1.1.3 do all things reasonably necessary to minimise modern slavery risks in its operations and supply chains; and
  - 1.1.4 include in its contracts with its direct subcontractors and suppliers anti-slavery and human trafficking provisions that are at least equivalent to those set out in this clause.
- 1.2 The [Supplier] warrants and represents that neither the Supplier nor any of its officers, employees or other persons associated with it in its supply chain has been convicted of any offence involving slavery and human trafficking; and having made reasonable enquiries, to the best of its knowledge, has been or is the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with slavery and human trafficking.
- 1.3 The [Supplier] shall promptly notify Robert Half in writing as soon as it becomes aware of:
- 1.3.1 Any breach, or potential breach, of this clause; or any actual or suspected modern slavery or human trafficking in its operations or a supply chain which has a connection with this contract.
  - 1.3.2 Robert Half may require within 20 business days that the Supplier undertake remedial action to rectify any breach of this clause, including ensuring its compliance with modern slavery Laws and minimising the risks of modern slavery in the Supplier's operations or supply chains.

## Corporate Offences Policy (Australia)

---

- 1.3.3 If the Supplier fails to undertake the remedial action as required in the notice referred to in clause [insert] above, Robert Half may terminate this agreement with immediate effect by giving written notice to the Supplier.
- 1.3.4 In the event of suspension or termination pursuant to this clause, Robert Half will not be required to pay any compensation to the Supplier for that suspension or termination or any consequential damages.
- 1.3.5 This clause does not limit, restrict or interfere with in any way any other right of suspension or termination given to Robert Half under this Agreement.
- 1.3.6 The Supplier will, on request by Robert Half provide a written statement and/or provide a completed questionnaire confirming that it; all its Related Bodies Corporate (as defined in the *Corporations Act 2001 (Cth)*); and all its tier 1 Suppliers, are not in any way involved in any form of modern slavery or human trafficking. The Supplier will, on request by Robert Half, take all reasonable steps to procure a written statement from any entity in any of its supply chains confirming that that entity is not in any way involved in any form of modern slavery or human trafficking.