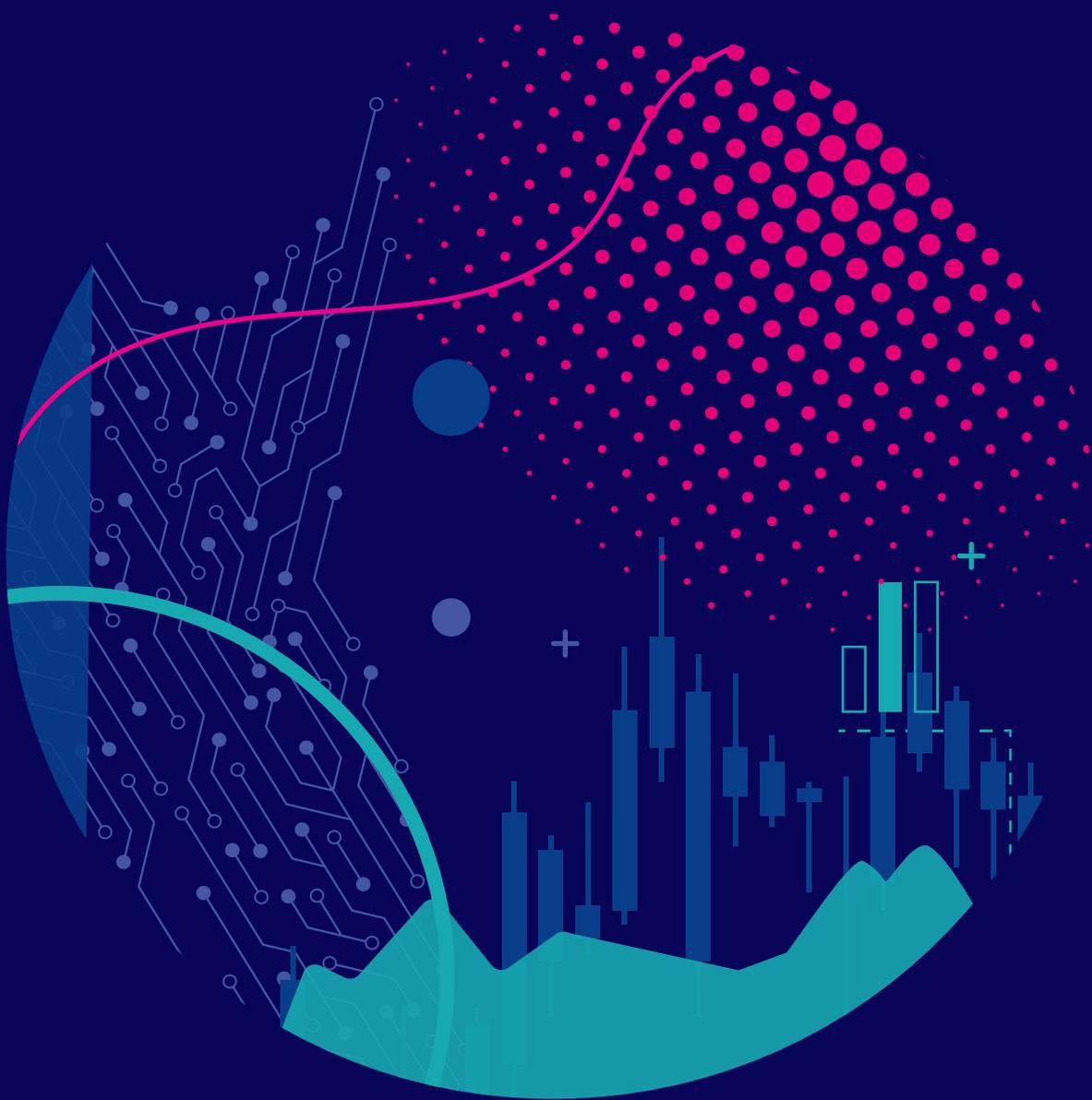


MODERN SLAVERY STATEMENT



This Modern Slavery Statement (**Statement**) has been prepared in line with the requirements of the Australian *Modern Slavery Act 2018 (Cth)* (**Act**). The Statement covers the reporting entity SEEK Limited (SEEK) and its controlled entities including Online Education Services Pty Limited (OES) which is also a reporting entity (together, the SEEK Group). The Statement explains the actions that SEEK has taken to assess and address potential modern slavery risks related to the the SEEK Group operations and supply chains during the financial year ended 30 June 2020 (**FY2020**).

2020

ABOUT SEEK

Structure and Operations

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

Main activities:

- Online matching of hirers and candidates with career opportunities and other related services
- Distribution and provision of higher education courses
- Investment in online education, HR SaaS and contingent labour businesses and technologies



Employing 1,000+ people in Australia and New Zealand, 10,000+ around the world.



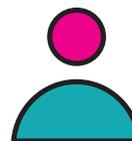
Australian public company listed on the Australian Securities Exchange (ASX:SEK) with headquarters in Melbourne, Victoria.



SEEK, the parent company of the SEEK Group, operates in Australia with subsidiaries operating in Australia, New Zealand, China, Hong Kong, South-East Asia, United Kingdom, Brazil & Mexico.*

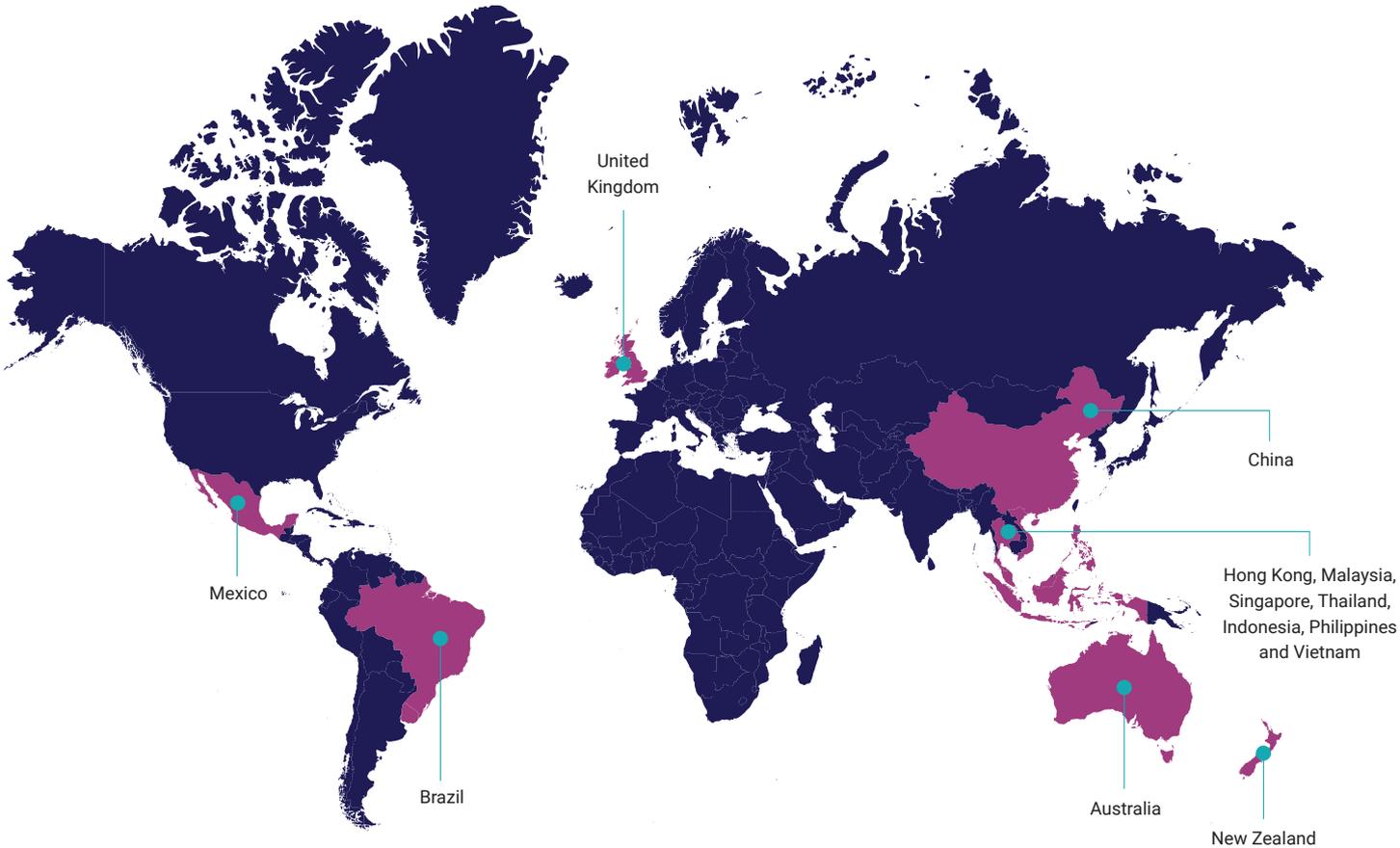


OES provides online higher education courses and services to students in partnership with six universities in Australia and the United Kingdom. SEEK has an 80% interest in OES.



OES employs 300+ people, mostly in Australia, and engages 600+ part time academic tutors.

SEEK OPERATIONS



Geographical coverage represents primary country/countries of operation for SEEK AP&A businesses, Zhaopin, OES and other entities controlled by SEEK.

Asia Pacific & Americas















SEEK Investments






About SEEK's supply chains

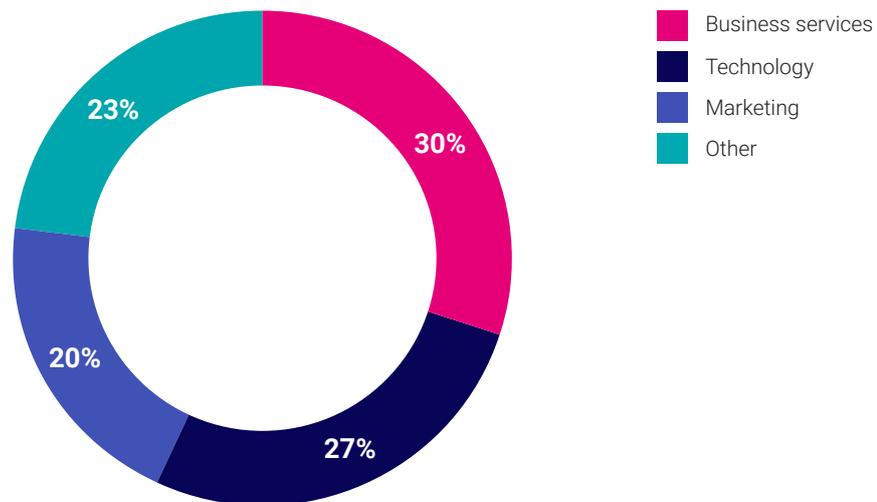
Operating Model

Spend and supply chain management at SEEK is decentralised across SEEK's various geographies and entities.

Categories of Spend

As a technology business, SEEK ANZ, SEEK Asia and OES key categories of spend include marketing, technology and business services. In SEEK ANZ, these represent over 75% of spend and over 60% of suppliers as set out in the graphic below.

% Spend by category in SEEK ANZ



Primary Spend Category	Examples of goods and services	Purpose
Technology	<ul style="list-style-type: none"> Software licenses and subscriptions Analytics services Infrastructure Hardware and peripherals 	SEEK relies on a diverse technology supply chain to develop, maintain and deliver products and services to customers and employees in a way that promotes service reliability and the protection of candidate, hirer, student, employee and business data.
Business Services	<ul style="list-style-type: none"> Technical consulting services Systems implementation Professional fees and audit Specialist contractor agencies 	SEEK leverages business and professional service suppliers to obtain specialist resources and expertise to meet specific technical, product and growth objectives, working in conjunction with its permanent workforce.
Marketing	<ul style="list-style-type: none"> Media and advertising Creative agencies Public relations and events 	SEEK's marketing team works with a broad range of creative and media suppliers, across both digital and traditional media channels, to reach and engage candidates and hirers across key segments.

In addition to these primary categories, common spend categories include stationery, facilities services (such as cleaning and foodstuffs) and incidentals such as utilities and travel related expenditure, demand for which has decreased as a result of the COVID-19 pandemic.

In addition, during FY2020 SEEK engaged suppliers relating to the construction and fit-out of its new Melbourne headquarters and other office locations.

Location of suppliers

The majority of SEEK ANZ's direct suppliers are located in geographies that demonstrate greater awareness of modern slavery and represent lower risks of modern slavery, specifically in Australia, New Zealand and the United States of America.

As the operator of online employment marketplaces and education services, modern slavery would not at first glance appear likely to touch SEEK. Sadly, the nature and extent of modern slavery means no company is immune from this risk.

SEEK's purpose is to help people live more fulfilling and productive working lives and help organisations succeed. Given this context, SEEK is opposed to slavery in all forms and has taken significant steps to identify any links between SEEK's operations and supply chains and modern slavery.

This Statement reports foundational work undertaken in FY2020, and sets a baseline for future work.

Modern slavery risk

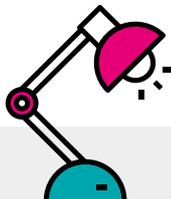
A methodology has been developed and applied to identify SEEK's operations and supply chain where risks of modern slavery may potentially exist.

SEEK has identified the following modern slavery risks.



Employment platforms

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



Office operations

Most people who work for SEEK are employed directly and on permanent contracts in skilled office-based roles. This lowers modern slavery risks within the workforce. Operational risk could be present in areas of the business using contracted or third-party office service providers such as cleaning. SEEK has less direct visibility and control over these workers and their employment terms. These workers could be recent migrants, international students, or other vulnerable groups, who may be less aware of their rights and, consequently, susceptible to exploitation.



Supply chains

SEEK predominantly engages suppliers that represent a lower inherent risk of modern slavery and that benefit from a more mature control environment, namely, technology, marketing and business services.

With some exceptions, such as merchandise, computers and hardware, purchases of goods and services do not involve material usage of raw materials and practices commonly associated with modern slavery. However, SEEK's visibility of modern slavery risks may be limited as a result of risks being deep within the supply chains of SEEK's direct suppliers.

The table below sets out some goods and services within SEEK's supply chains with elevated inherent modern slavery risks:

Goods:

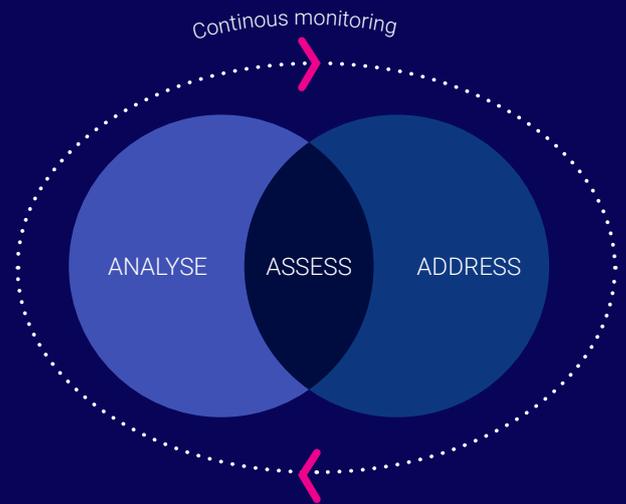
- Coffee, tea and other beverages
- Foodstuffs
- Cleaning and medical products
- Computer equipment and peripherals
- Office furniture
- Networking and cabling
- Apparel and branded merchandise
- Printing, consumables and stationery

Services:

- Cleaning services
- Facilities management and maintenance
- Construction and building services
- Off-shore or remote consulting services

SEEK's Modern Slavery Program

SEEK takes a Group approach to assessing and addressing modern slavery risk across the global business. The intent is to prioritise higher risk operational and supply chain risks and develop knowledge and expertise as the program evolves. SEEK's risk management system is applied to the risk assessment and recording of modern slavery risk and remediation. The Modern Slavery Program of due diligence activities across the business and supply chains is planned on a three year rolling basis. For each due diligence exercise clear actions, accountabilities and timeframes apply.



Actions to assess and address modern slavery risk on employment platforms

> Analyse

SEEK operates employment platforms in Australia, New Zealand, China, Hong Kong, South-East Asia, Brazil and Mexico and, in some countries, multiple platforms.

During FY2020 a methodology was developed to analyse the inherent risks of each SEEK employment platform being linked to modern slavery practices. Each employment platform is assigned a country risk rating based on external data available through Walk Free "Modern Slavery Index" and qualitative data produced by the "2020 Trafficking in Persons Report" produced by the US State Department. Specific recruitment practices associated with an employment platform increases the risk rating, for example overseas placements, pooled labour, placement fees and job ads specifying age or gender. The volume of job advertisements displayed during calendar year 2019, prior to the significant impact of COVID-19 on job ad volumes, informs the scale of the inherent risk.

This analysis informs an inherent risk rating for each employment platform. The inherent risk analysis is performed at least annually.

Assess

The analysis of the inherent risks of each employment platform being linked to modern slavery prioritises assessment activity. For FY2020 this resulted in due diligence of the employment websites in the Philippines: JobStreet, Workabroad and Seaman Jobsite. The due diligence assessment is detailed on page 6.

> Address

SEEK acknowledges its role and responsibility to safeguard against the risk of modern slavery in advertising job opportunities which could be deceptive recruiting for forced or bonded labour including human trafficking.

Since the first SEEK website, www.seek.com.au, was launched in 1998, SEEK has continuously improved product and search technology. SEEK's Australia and New Zealand employment platform is the most advanced in terms of product and technology capability. This includes processes to counter potential fraud by 'bad actors', for example job advertisements which ask candidates for personal and financial information. Deceptive recruitment is a form of online fraud. Harnessing technology, data and insights, SEEK's security processes prevent and detect potential fraud through a range of measures including:

- Checking the validity of hirers before they advertise
- Job ad templates requiring specific job information
- Automated and manual checking of job ads for words associated with fraudulent ads and suspicious metadata
- Encouraging complaints from candidates about deceptive ads via "Report this Ad" channels

Due Diligence

Philippines employment platforms

Recruitment and placement in jobs abroad is a significant industry in the Philippines. At any one time around 2.2 million overseas Filipino workers (OFW) are working abroad. OFW remittances account for about 10% of the GDP of the Philippines. The overseas placements industry creates risks for OFW of substandard working conditions through to serious criminal exploitation. For this reason the Philippines Government significantly regulates this industry, including through a licensing regime for recruitment agencies and an approval process for overseas job placements.

The SEEK Group operates JobStreet PH as part of the JobStreet South East Asian businesses and acquired the established job websites Workabroad and Seaman Jobsite in 2016. Of all legal jobs for OFW, 95% are advertised on Workabroad. The SEEK Asia business was already alert to the inherent modern slavery risk of advertising overseas jobs in the Philippines.

The due diligence of the three Philippine websites during FY2020 did not identify instances of modern slavery but did find elevated risks of deceptive recruitment on the Workabroad website. Workabroad only allows recruitment agencies licensed by the Government agency, POEA, to advertise jobs. However, delays by the POEA result in licensed recruitment agencies posting manpower pooling job ads for possible jobs rather than ads for specific jobs on the Workabroad website. Candidates are expected to pay placement fees for employment with no visibility of the fees in the job ad. Many hirers provide little detail in ads beyond the job title and country. Subscriber pricing allows hirers unlimited advertising resulting in repetitive, low quality job ads.

Improvements already planned for the Workabroad website will significantly improve the quality and reliability of job information for candidates. Specifically to reduce the risk of deceptive recruitment leading to modern slavery, the following actions are underway for completion in FY2021:

- Recruitment agencies must demonstrate POEA approval of a job ad before posting
- An enhanced job template will ensure hirers provide visibility for candidates of the job role, salary, placement fees and more.
- Quality controls will be uplifted to improve detection and blocking of potentially deceptive job ads.
- A "Report this ad" function will be added to encourage candidates to report concerns about potentially deceptive job ads.

Local management has embraced the opportunity to improve the job website and reduce the risk of modern slavery.

Due Diligence

Australian employment platform

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

The SEEK employment platform in Australia presents as very low inherent risk for modern slavery. Operations take place in Australia which has a low prevalence of modern slavery. SEEK's workforce comprises predominantly permanent employees in skilled office-based roles, with 8% employed on a fixed-term or casual basis. SEEK predominantly engages suppliers that represent a lower inherent risk of modern slavery namely, technology, marketing and business services. The majority of SEEK ANZ's suppliers are located in Australia, New Zealand or the United States of America. In FY2020, SEEK began an on-going program of work to assess those individual suppliers to SEEK's Australian business that indicated elevated inherent risks of modern slavery. No instances of modern slavery in SEEK's supply chain were identified or reported during the reporting period.

Jobs advertised on the employment platform www.seek.com.au are for roles in Australia and are subject to anti-discrimination laws. Hirers pay to advertise and candidates do not pay to get jobs in Australia. Despite low inherent risk, a due diligence assessment of the SEEK Australia employment platform is being performed during FY2021.

The due diligence assessed the current controls over fraudulent job ads which are managed by SEEK's Trust and Security team. These controls are designed to prevent and detect fraudulent job ads, including deceptive recruitment, and fraudulent hirer accounts.

Controls include:

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

Job ads which may result in a candidate paying for a job is a breach of SEEK's Advertising Terms and Conditions.

SEEK did not identify any specific instances of modern slavery harm. The due diligence concluded that the controls are designed effectively to prevent, detect and correct fraudulent job ads. The SEEK employment platform in Australia is at low risk of deceptive recruitment leading to modern slavery.

Actions to assess and address modern slavery risk in supply chains

In FY2020, SEEK designed and commenced its supply chain modern slavery risk assessment framework described below. This encompasses existing (legacy) suppliers as well as activities relating to the onboarding of new suppliers.

> Analyse

During FY2020, SEEK ANZ, SEEK Asia and OES each performed analysis of respective supply chains and associated practices to analyse the inherent risks of modern slavery. In addition to drawing on local knowledge and experience, inherent risk analysis was conducted based upon (i) country of supply, (ii) supplier industry, (iii) type of good or service provided by that supplier.

In addition to manual review and analysis against this framework, SEEK ANZ partnered with FRDM, a leading supply chain risk analysis and monitoring platform, to facilitate risk analysis and identify elevated risks of modern slavery.

Recognising that SEEK does not have a centralised view of suppliers and purchases across all entities, SEEK also began a program of briefings with relevant leaders in SEEK Asia, OES, Catho and OCC to increase awareness of modern slavery.

Analysis did not identify any actual instances of modern slavery within the direct supply chains of SEEK ANZ, SEEK Asia or OES. However, suppliers with elevated risks of modern slavery were identified based upon their country of supply, industry or the type of good or service purchased. These suppliers were identified for further investigation to assess the risk of modern slavery in their operations and supply chains.

SEEK will continue to maintain and update its inherent risk analysis of suppliers.

> Assess

SEEK takes a risk based approach that prioritises higher risk suppliers. During FY2020 SEEK commenced engagement with suppliers identified as having elevated inherent risks of modern slavery to conduct a more detailed risk assessment of the supplier's operations and supply chain.

Information was requested from selected suppliers relating to an understanding of:

1. The conclusions and findings from the supplier's modern slavery risk analysis in supply chains and operations;
2. The names of organisations within the supplier's supply chains or operations for which modern slavery risks had been identified;
3. Available anti-modern slavery policies, supplier codes of conduct or other documentation that demonstrated how the supplier sought to prevent modern slavery in its supply chain and operations.

As part of this engagement, SEEK also communicated its Supplier Code of Conduct detailing SEEK's expectations and requirements of suppliers in relation to modern slavery and other issues.

SEEK will assess suppliers with elevated inherent risks of modern slavery on an ongoing basis.

> Address

SEEK is committed to addressing and remediating any instances of modern slavery identified in its supply chain. During FY2020, SEEK was not made aware of any human trafficking or modern slavery allegations against any supplier.

Whilst no remediation activities were required in relation to specific suppliers, in FY2020 SEEK undertook the following activities to increase awareness and reduce the risk of modern slavery across its operations and supply chain:

1. Management briefings

Recognising the importance of education and awareness of the risks and impacts of modern slavery, SEEK undertook a series of executive briefing sessions across SEEK Asia Pacific and Americas and OES.

2. Supplier Code of Conduct

SEEK published its Supplier Code of Conduct which, amongst other things, raises awareness amongst suppliers of modern slavery and requires them to institute practices and controls that promote human rights and do not involve modern slavery. Implemented in SEEK ANZ, all new and renewing suppliers are required to accept SEEK's Supplier Code of Conduct as part of trading with SEEK. SEEK will continue to pursue trading relationships with suppliers that accept its Supplier Code of Conduct.

3. Anti-modern slavery contract terms

As a key control, SEEK (with the support of outside counsel) prepared a series of legal clauses designed to obtain supplier commitment to anti-modern slavery practice. These clauses are employed in relevant supplier contracts based upon the size and category of spend.

4. Supplier due diligence

SEEK incorporated additional due diligence measures as part of supplier on-boarding and procurement-stage activities in SEEK ANZ to elevate awareness of modern slavery and enhance SEEK's ability to identify inherent modern slavery risks associated with new and renewing suppliers.

Leveraging the experience and procurement maturity in SEEK ANZ, these activities will be expanded to other SEEK entities as part of the Modern Slavery Program.

Modern slavery aware culture at SEEK



Awareness

SEEK is building an understanding across the Group of the extent of modern slavery and the potential that SEEK may be linked to or contributing to modern slavery.

During FY2020 targeted briefings were delivered to build awareness of modern slavery and the Modern Slavery Program to the SEEK Board, executive teams and corporate functions, including the Finance function which incorporates Procurement. Briefings were provided to the Board and Executive Team of OES.



Diligence

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



Reporting

"Report this ad" channels encourage candidates to report suspicious job ads to SEEK. The Customer Service Centres also receive and refer such reports to the operational areas of the business.

During FY2020 the SEEK Group Whistleblower Protection Policy was updated to encourage reporting and outline what protections a person who reports a wrongdoing will receive. Whistleblower channels provide a safe way for SEEK's employees, suppliers and contractors to raise concerns about improper conduct at SEEK, including conduct relating to modern slavery.

Assessment of the effectiveness of the actions taken



Employment platforms

- Implementation of remedial actions to reduce the risk of deceptive recruitment is tracked and reported through established lines of accountability. KPI's are established and scheduled for review as part of the Modern Slavery Program.
- Due diligence findings and remedial actions are recorded in the SEEK risk and audit findings database, LogicGate.
- The inherent risk of each SEEK employment platform being linked to modern slavery practices is re-assessed at least annually. Adjustments may be made based on changes to the business or new information about modern slavery risks, including information in the Modern Slavery Statements of other companies.
- Monitoring of complaints received through the employment platforms "Report this ad" and contacts received by the Service Centre.



Supply chain

SEEK takes a collaborative approach to working with suppliers and has begun to engage with suppliers to improve mutual understanding of modern slavery risks within the operations of SEEK's suppliers.

SEEK will measure the effectiveness of its supply chain modern slavery framework based upon the metrics set out below.

Effectiveness indicator	Purpose
Risk analysis coverage	Measure the number of suppliers that have been subjected to risk analysis during the period as a percentage of total suppliers and total spend value.
Rate of code of conduct acceptance	Measure the number of suppliers that have accepted SEEK's Supplier Code of Conduct during registration or other on-boarding with SEEK.
Absence of modern slavery incidents in the supply chain	Measure the number of reported or identified instances of modern slavery associated with material suppliers in SEEK's supply chain.

Consultation with SEEK entities

SEEK takes a Group approach to addressing modern slavery risk. The Modern Slavery Program is planned on a three year rolling basis in consultation with senior management at SEEK, SEEK Asia, OES and other businesses. During FY2020 SEEK undertook a series of executive briefing sessions across SEEK Asia Pacific and Americas, specifically with SEEK Asia, OES, OCC and Catho businesses. Given the focus in FY2020 on the SEEK Asia business, the SEEK Asia Chief Financial Officer and other team members were involved in regular modern slavery stand up meetings. The Chief Executive Officer SEEK Asia led the engagement across SEEK Asia and provided detailed oversight of the review of the Philippines employment platforms.

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

Approval

This Statement was approved by the Board of SEEK following review by the directors.



Graham Goldsmith
Chairman

Dated 19 November 2020



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

Level 6, 541 St Kilda Road
Melbourne, VIC 3004
ABN 46 080 075 314

Online Education Services Pty Limited is a company incorporated in Australia with shares held by the SEEK Group (80%) and by Swinburne University of Technology (20%). Its registered office and principal place of business is:

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

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

companysecretary@seek.com.au

The SEEK ANZ whistleblower channel at
www.SEEKWhistleblower.deloitte.com.au

seek.com.au
seek.co.nz
seekbusiness.com.au
seek.com.au/learning
seekvolunteer.com.au
certsy.com
au.gradconnection.com
jobsdb.com
jobstreet.com
catho.com.br
occ.com.mx
jora.com
zhaopin.com
oes.edu.au
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sidekicker.com