

# MODERN SLAVERY STATEMENT

Reporting Period: 1 July 2024 to 30 June 2025  
Reporting Year: 3

## Introduction

This Modern Slavery Statement (Statement) covers the activities of Employment Hero Holdings Pty Ltd (ACN 611 036 796) and its related entities or affiliates (together, Employment Hero, we, our, us).

This is our third Modern Slavery Statement covering the period 1 July 2024 to 30 June 2025 (Reporting Period). It has been prepared to comply with our obligations under:

The Modern Slavery Act 2018 (Cth)  
**(Australian Act)**

The Modern Slavery Act 2015 (UK) **(UK Act)**

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)  
**(Canadian Act)**

Employment Hero recognises the importance of combating modern slavery around the world and identifying the potential risks that may arise within our business and across our supply chains. This Statement reflects our continued commitment to mitigating the risks of modern slavery and forced labour through improved governance, strengthened controls, and increased transparency across our global operations.

During the Reporting Period, we expanded our global presence with the acquisition and integration of **Humi Holdings Corp and its affiliates (Humi)**, a Canadian HR and payroll software provider. As a result, Employment Hero became subject to the Canadian Act's mandatory annual reporting requirements. We also implemented a third-party hosted whistleblower platform, providing secure, independent and confidential channels for reporting concerns, including matters related to modern slavery.

We remain committed to monitoring global developments in modern slavery regulation, including anticipated reforms to the Australian Act, updates to UK enforcement expectations, and the Canadian Government's guidance under the Canadian Act.

## About Employment Hero

Employment Hero is on a mission to revolutionise the way the world works. Born in 2014, the company has established itself as a global leader in the employment tech space, driven by its unwavering mission to make work easier and lift employment to new heights.

Employment Hero recognises the intricate complexities and ever-evolving demands of the modern workplace. By delving into the heart of global employment needs and challenges, we strive to bring innovation-led solutions that help businesses and workers thrive.

Employment Hero empowers businesses to embrace the future of work, where efficiency, innovation, and employee well-being are at the forefront.

# Structure, operations and supply chains

## Structure, operations and supply chains

Employment Hero Holdings Pty Ltd is headquartered in Sydney, Australia, and is the parent company of the Employment Hero group.

This Statement covers multiple Employment Hero corporate group entities including (amongst others):

- Employment Hero Pty Ltd
- Employment Hero UK Limited
- Employment Innovations Group Pty Ltd
- Employment Innovations Payroll UK Ltd
- Employment Hero Pte Ltd (Singapore)
- Employment Hero NZ Limited
- Employment Hero Sdn. Bhd.
- EH Philippines Inc.
- Employment Hero Vietnam Limited
- Remote Hero (Australia) Pty Ltd
- Webscale Pty Ltd
- Humi Holdings Corp.
- Humi Soft Inc.
- Humi Payroll Ltd
- Ameego Restaurant Solution Inc.

All Employment Hero group entities follow the global policies and processes as set and directed by Employment Hero Holdings Pty Ltd.

We provide our core services across Australia, the United Kingdom, New Zealand, Singapore, Malaysia, and Canada, supported by a remote-first workforce of over 1,700 employees worldwide.

## Operations

Employment Hero provides a cloud-based platform that has expanded beyond HR, payroll and employee benefits to include a full suite of AI-powered employment products and global employment services. Our platform supports SMEs to run their business more efficiently, and provides employees and job seekers with tools to improve their financial wellbeing and career development.

### Range of Employment Hero services:

- HR and payroll software
- Employment Hero Work app (EH Work app)
- 'Benefits' (discounts, cashbacks and megadeals offered through the EH Work app)
- 'Money' (financial products and services offered through the EH Work app)
- SmartMatch
- Employment Hero jobs board and the Employment Hero Jobs app
- Applicant tracking system
- Global Teams employer of record services
- Learning and development
- AI enhancement features within the platform

In early 2025, we acquired Humi, one of Canada's leading providers of HRIS and payroll software. Humi's solutions and workforce have been integrated into the wider Employment Hero group and are now covered by this Statement.

Globally, we service over 400,000 businesses, manage over 2 million employees, and process over \$100bn in payroll annually.

# Structure, operations and supply chains

## Supply chains

Employment Hero’s supply chains support both the delivery of services to customers and our internal business operations. This includes procurement of:

- Software and technology (our largest supplier category)
- Professional services
- Marketing and promotional materials
- Merchandise
- Events, travel and hospitality
- Real estate and office services

Following updated analysis completed in this Reporting Period, our supplier distribution by region is as follows:

Region	Percentage (%)
Australia	49.6
Canada	1.15
China	0.10
European Union	4.27
India	0.63
Indonesia	0.10
Malaysia	1.77
New Zealand	8.33
Philippines	0.21
Singapore	5.31
United Kingdom	15.42
United States	13.02

Employment Hero does not engage suppliers located in countries identified as “high risk” under the Global Slavery Index.

# Modern slavery risks

Employment Hero maintains a zero-tolerance approach to modern slavery and continues to implement systems and processes to identify and assess the risks of modern slavery, forced labour and child labour across its operations and supply chains. Although our core business as a cloud-based software provider presents a lower inherent risk profile, we recognise that modern slavery risks may still arise, particularly given our global expansion and extensive supplier network. Some areas of risk identified in previous years continue to be reviewed and are still being explored as part of our evolving compliance framework.

## Workforce risks

Employment Hero is mindful of the potential for exploitation in workforce recruitment and engagement, particularly across different jurisdictions with varied labour standards. As a remote-first and rapidly scaling organisation, we recognise the challenges that may arise in ensuring consistent oversight of workplace rights, conditions and entitlements. We recognise risks related to:

- Variations in labour protections and employment regulations across countries
- Contractor engagement practices and the potential for inconsistent working conditions
- Oversight challenges associated with remote work, including wellbeing impacts and workload distribution
- Heightened risks posed by differing privacy, data-use and technology standards across jurisdictions, particularly as we continue to deploy AI-driven tools within our platform
- Cultural or geographic disparities that may affect visibility of potential issues or access to reporting mechanisms

During the Reporting Period, as part of our integration of Humi and expansion into the Canadian market, we reviewed our internal governance and employment practices to ensure alignment with Canadian labour standards and the Canadian Act. Oversight and management of remote teams remains a core focus, and further assessment of workforce-specific modern slavery risks is still being explored as part of our broader multi-year risk assessment program.

## Supply chain risks

Employment Hero recognises the risk of modern slavery within its supply chain, particularly in the production of merchandise and suppliers involved in overseas events or off-sites, including our yearly company gathering. By the nature of Employment Hero's software-based business services, the company does not contract with large manufacturing companies that generally present high risks of modern slavery within their operations or supply chains. Employment Hero also engages mostly with reputable third party providers in the SaaS sector which present lower modern slavery risks. We recognise that our greatest risks related to modern slavery may arise in connection with our in-person events, particularly our annual company gathering, and more broadly, in relation to hospitality, and merchandise procurement, as these are generally considered higher risk industries. These areas involve complex supply chains and the potential for labor exploitation, which requires ongoing vigilance. For our annual company gathering, we use an external supplier, who organises all accommodation, travel and hospitality. Whilst they undertake modern slavery due diligence as part of organising the event, this is a risk we are aware of and continue to mitigate.

We continue to work closely with key service providers who conduct modern slavery due diligence as part of their event procurement processes.

We are pleased to confirm that we have not identified any instances of modern slavery in our supply chain during the Reporting Period. We remain committed to assessing and addressing these risks to uphold ethical practices across all aspects of our business.

During the Reporting Period and beyond, Employment Hero did not engage with any suppliers in the countries identified in the Global Slavery Index as those where modern slavery is most prevalent or as countries taking the least action in respect of combating modern slavery.

## Actions to control and mitigate modern slavery risks

Employment Hero takes a group-wide approach to modern slavery compliance, with clear policies, procedures and processes to mitigate risks across our global operations. Employment Hero continues to adopt a group-wide approach to modern slavery compliance, with policies, procedures and processes designed to assess, monitor and mitigate the risks of modern slavery, forced labour and child labour in our operations and supply chains. While we have made meaningful progress over the Reporting Period, we recognise that this remains an ongoing, multi-year journey. Some initiatives identified in our previous Statement remain in development and are still being explored, as noted below.

### Compliance controls

At Employment Hero, we maintain a range of compliance controls to ensure that our workforce is protected and that all workers engaged across the group are employed in accordance with relevant labour laws. These include annual reviews of employment contracts, audits of working conditions, and regular assessments to ensure adherence to local and international labour standards. As our global footprint expanded during the

Reporting Period, we worked towards strengthening our internal governance framework to reflect the requirements of the Modern Slavery Act 2018 (Cth), the Modern Slavery Act 2015 (UK), and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act. We also continued to reinforce ethical employment practices in regions where we operate employer-of-record services, ensuring compliance with labour laws and supporting responsible recruitment principles.

### Internal policies and training

All employees play a critical role in identifying and preventing modern slavery. Employment Hero provides mandatory modern slavery training and requires all staff to read and acknowledge our Modern Slavery Policy.

During the Reporting Period, we reviewed and refreshed the Modern Slavery Policy, ensuring it clearly sets out escalation pathways, responsibilities of staff, and additional obligations arising from the Canadian Act. The mandatory training provided to staff covers:

- Identifying signs and indicators of modern slavery
- Key policies and procedures relating to modern slavery
- Reporting mechanisms and escalation processes
- The consequences of engaging in or supporting modern slavery and forced labour practices

By maintaining clear and accessible policies, Employment Hero aims to create a well-informed and vigilant workforce that is empowered to respond to potential risks.

## Supplier Code of Conduct

A core element of our approach to mitigating modern slavery risks in our supply chain is our Supplier Code of Conduct. This document outlines the ethical standards and principles required of all suppliers, including explicit prohibitions on forced labour, child labour, and any practices inconsistent with fundamental human rights. Suppliers must ensure workers are paid fairly, work reasonable hours, and have access to safe and hygienic working conditions.

## Modern Slavery Attestation

Employment Hero requires all suppliers to complete a Modern Slavery Attestation as part of the onboarding and procurement process. This attestation goes beyond a compliance form and acts as an educational tool, encouraging suppliers to assess their own practices and their alignment with modern slavery frameworks.

## Whistleblower policy and reporting mechanisms

Transparency and accountability remain central to Employment Hero's approach. During the Reporting Period, we **implemented a new third-party hosted whistleblower platform**, providing secure, independent and confidential reporting channels for employees, contractors, suppliers and stakeholders. This platform offers dedicated reporting categories for modern slavery, forced labour and child labour concerns.

In connection with this implementation, we reviewed and updated our Whistleblower Policy, including improvements to escalation procedures and reporting pathways. This ensures concerns can be raised safely and investigated appropriately, without fear of retaliation.

## Monitoring the regulatory landscape

Employment Hero continues to monitor developments in modern slavery regulation across all jurisdictions in which we operate. This includes:

- Anticipated reforms to the Australian Act
- Updated enforcement expectations in the UK
- Federal guidance and reporting requirements under the Canadian Act
- International developments impacting forced labour risks, including updates to the Global Slavery Index

We remain committed to adapting our policies and practices to reflect these developments and will continue to report on our progress in future statements.

## Effectiveness of actions and controls

Employment Hero measures the effectiveness of its modern slavery controls using KPIs, including:

### 1. Awareness and training:

Number of staff who completed mandatory training and acknowledged the Modern Slavery Policy.

### 2. Whistleblower and Code of Conduct reporting:

Number of issues raised and resolved under our Whistleblower Policy or Code of Conduct.

### 3. Continued internal discussions on improving anti-modern slavery processes:

Progress in establishing a working group dedicated to implementing our multi-year modern slavery roadmap.



#### 4. Supplier compliance:

Percentage of suppliers completing the Modern Slavery Attestation, including alignment with Canadian Act requirements.

We confirm that we have not identified any specific instance of modern slavery or forced labour during the Reporting Period.

Employment Hero will continue to carry out regular communication, audits, and evaluations of the company's policies and processes which will be an ongoing effort to ensure effective monitoring and assessment of modern slavery risks in its operations and supply chains.

## Consultation

This Statement was prepared in consultation with all entities owned or controlled by Employment Hero Holdings Pty Ltd. We engaged key internal stakeholders, including legal, procurement, people and culture, and finance teams, and incorporated feedback from teams across Australia, the UK, and Canada.

This Statement is intended to serve as a joint statement for the purposes of the Australian Act, the UK Act, and the Canadian Act.

## Approval

### Principal Governing Body Approval

This Modern Slavery Statement was approved by the Board of Employment Hero Holdings Pty Ltd (ACN 611 036 796) in accordance with section 13 of the Modern Slavery Act 2018 (Cth), section 54 of the Modern Slavery Act 2015 (UK), and section 11 of the Canadian Act.

### Signature of Responsible Member

This modern slavery statement was signed by Benjamin Thompson in his role as Chief Executive Officer of Employment Hero Holdings Pty Ltd (ACN 611 036 796) (in accordance with section 13 of the Modern Slavery Act 2018 (Cth)).



Benjamin Thompson  
Chief Executive Officer  
Employment Hero Holdings Pty Ltd