



Federal Court of Australia

District Registry: Victoria

Division: Fair Work

No: VID1661/2018

LAWRENCE RIDGE

Applicant

HAYS SPECIALIST RECRUITMENT (AUSTRALIA) PTY LIMITED (ACN 001 407 281)

Respondent

ORDER

JUDGE: JUSTICE MURPHY

DATE OF ORDER: 18 December 2023

WHERE MADE: Melbourne

THE COURT ORDERS THAT:

Registration to participate in the Proposed Settlement

1. Further to the Orders dated 03 May 2023 (**3 May Orders**), any group member who has not opted out of the proceedings, and who registered by the deadline in the 3 May Orders is a “**Previously Registered Group Member**”.
2. Any group member who has not opted out of these proceedings, and is not a Previously Registered Group Member, but who registers to participate in the Proposed Settlement in accordance with Order 3 of these orders is an “**Additional Registered Group Member**”.
3. Any group member who wishes to register as an Additional Registered Group Member to participate in the Proposed Settlement must, by no later than 29 January 2024 (**Final Registration Deadline**), register by:
 - (a) completing a Group Member Registration Form in the form set out at Schedule 1 of the Notice of Proposed Settlement (being **Annexure A** to these Orders), either online at <https://www.aderolaw.com.au/class-actions/mining/hays/> or by emailing or posting a hard copy to Adero Law at the address shown on the Group Member Registration Form; and



- (b) providing, by completing the Group Member Registration Form, the Additional Registered Group Member's full name, date of birth, postal address, email address and phone number (**Additional Registration Data**).
4. Upon registration, the Additional Registered Group Member will be requested to provide the following further information by Adero Law:
 - (a) the Additional Registered Group Member's Employee identification number(s) during their employment with the respondent (as set out in the payslips issued to them by the respondent);
 - (b) the Additional Registered Group Member's Tax File Number;
 - (c) a Bank State Branch (BSB), Account Number and Account Name for an Australian Bank Account, into which any share of a settlement sum distributed to the Additional Registered Group Member in accordance with the Settlement Distribution Scheme shall be paid; and
 - (d) proof of identity (such as passport number or driver's licence number) and a copy of the relevant document.
5. By 30 January 2024, the Applicant's solicitors will provide the Respondent's solicitors with the Additional Registration Data.
6. By 19 February 2024, the Respondent will, acting reasonably, advise the Applicant in writing which Previously Registered Group Members and persons included in the Additional Registration Data are Group Members, with the result that such persons who the Respondent confirms are Group Members will become '**Registered Group Members**'.
7. In the event of a dispute about a person's eligibility to be a Registered Group Member, the Applicant or that person may apply to the Court for resolution of the dispute.
8. All Registered Group Members will be participants in the Proposed Settlement in the event that it receives approval by the Court.
9. Any group member who:
 - (a) as at the date of these Orders:



- (ii) has not opted out of these proceedings in accordance with the 3 May Orders;
 - (iii) is not a Previously Registered Group Member; and
- (b) after the Final Registration Deadline, is not a Registered Group Member, is an “**Unregistered Group Member**” for the purposes of the proceedings and will remain a group member for all purposes but will not, subject to further order of the Court, be entitled to receive any payment as part of the Proposed Settlement in the event that it receives approval by the Court.

Notice of Proposed Settlement and Distribution of Notice

10. Group Members be given notice of:
- (a) the Proposed Settlement;
 - (b) the right for Group Members who are not Previously Registered Group Members to register to participate in the Proposed Settlement and become an Additional Registered Group Member;
 - (c) the fact that they may oppose the Proposed Settlement and/or any aspect of the distribution of the settlement sum in accordance with these Orders; and
 - (d) in respect of Previously Unregistered Group Members, that if they do nothing, they will be bound by the Proposed Settlement if it receives approval by the Court but will not be entitled to receive any payment as part of the Proposed Settlement.
11. The form and content of the notice at **Annexure A** to these Orders, which includes the Group Member Registration Form and Notice of Objection to Proposed Settlement Form (**Notice of Proposed Settlement**), is approved.
12. The Notice of Proposed Settlement may be amended by the parties before the Notice of Proposed Settlement is posted, emailed or published in order to correct any postal, website, email address or telephone number or any typesetting, typographical or other non-substantive errors.
13. The Notice of Proposed Settlement is to be given to Group Members according to the procedure set out in Orders 13 to 18 below.



Online publication

14. From 22 December 2023 until up to and including the final determination of the Approval Application the applicant is, by his solicitors Adero Law, to publish the Notice of Proposed Settlement on their website at the address <https://www.aderolaw.com.au/class-actions/mining/hays/> and on their Facebook page at the address <https://www.facebook.com/aderolawfirm/>.
15. Adero Law shall cause a copy of:
 - (a) the Amended Statement of Claim dated 5 August 2022;
 - (b) the Defence dated 28 October 2022;
 - (c) the Reply dated 18 November 2022;
 - (d) these Orders; and
 - (e) the Microsoft Teams link and accompanying details to enable those group members who wish to observe or to be heard at the Approval Application hearing, once it has been listed and made available by the Court.

to be displayed on, or otherwise made available for download from, their website at the address <https://www.aderolaw.com.au/class-actions/mining/hays/> and to remain continuously displayed or available up to and including the final determination of the Approval Application.

Previously Registered Group Members

16. In the case of Previously Registered Group Members, Adero Law will cause the Notice of Proposed Settlement and Registered Group Member Cover Letter in the form at **Annexure B** to these orders to be sent on or before 20 December 2023 to them at the email addresses previously provided to Adero Law, or by ordinary post in the event that they have not specified an email address.



All Group Members

17. By no later than 19 December 2023, the Applicant shall engage a third party mailing service provider (**Mailing Service Provider**) to send the Notice of Proposed Settlement and shall provide:
 - (a) a copy of these orders to the Mailing Service Provider; and
 - (b) a list of the Previously Registered Group Members (**List of Previously Registered Group Members**).
18. By 21 December 2023, the Mailing Service Provider will prepare a list of Previously Unregistered Group Members (**List of Previously Unregistered Group Members**) by removing the name of any person which appears on the List of Previously Registered Group Members from the Respondent's List of Group Members (as defined in order 12(b)(ii) of the Orders made on 3 May 2023 by Justice Murphy).
19. By 21 December 2023, the Mailing Service Provider will cause the Notice of Proposed Settlement and Group Member Cover Letter in the form at **Annexure C** to these Orders to be sent to each Group Member on the List of Previously Unregistered Group Members in accordance with the procedures and requirements set out in the following paragraphs (**Distribution Protocol**):
 - (a) the Mailing Service Provider will keep the List of Previously Unregistered Group Members confidential, and will not disclose any information in it to any other person including the Applicant or his legal advisors;
 - (b) the Mailing Service Provider will send the Notice of Proposed Settlement to the persons listed on the List of Previously Unregistered Group Members, doing so under cover of the Group Member Cover Letter at Annexure C to these Orders, by sending it by email to each person on the list for whom an email address is held, and by ordinary post to the last recorded postal address of that person in the event that the Respondent does not have an email address;
 - (c) if the Mailing Service Provider receives an electronic notice that an email to any person on the List of Previously Unregistered Group Members has not been delivered to the addressee, the Mailing Service Provider shall within 72 hours send the Notice of Proposed Settlement under cover of the Group Member Cover Letter by ordinary post to the last recorded postal address of that person;



- (d) the Mailing Service Provider shall within seven (7) days after completion of the preceding steps provide to the Respondent's solicitors a list of the persons to whom the notice was sent, together with the email or postal address to which the notice was sent, and which identifies in relation to each potential Group Member:
- (i) the method(s) by which the Notice of Proposed Settlement was sent;
 - (ii) the date(s) on which the Notice of Proposed Settlement was sent;
 - (iii) whether and which distribution attempts failed; and
 - (iv) the form of the evidence by which any failed distribution attempt was identified, including, but not limited to, by way of receipt of an email delivery failure notification, or receipt of a prepaid ordinary post envelope marked 'return to sender' (or similar).
- (e) the Mailing Service Provider is to retain records for the duration of this proceeding of all communications sent to and received from each person listed in the List of Previously Unregistered Group Members in the course of carrying out this Distribution Protocol, including:
- (i) the emails sent in accordance with subparagraph (b) above;
 - (ii) postal records or receipts or similar of the Notices to Group Members sent by prepaid ordinary post in accordance with subparagraph (c) above; and
 - (iii) evidence of any failed distribution attempts of the kind referred to in subparagraph (d)(iv) above.
20. Should either party become aware of any actual or potential non compliance with the Distribution Protocol, they are to notify the other party within two (2) business days of becoming so aware, and are directed to promptly advise the Court of any such non-compliance via email to Justice Murphy's Associate.
21. The cost of the Mailing Service Provider engaged to undertake the distribution of the Notice of Proposed Settlement and Group Member Cover Letter in accordance with the Distribution Protocol is payable by the applicant to the Mailing Service Provider forthwith.



22. By 4:00 pm on 21 February 2024, Adero Law is to file and serve an affidavit deposing to its compliance with Orders 14 to 17.

Appointment of Costs Referee

23. Kerrie Rosati is appointed as a referee (**Costs Referee**) to inquire into and report to the Court (**Report**) stating her opinion, with reasons, on the following matters:

- (a) the reasonableness of the Applicants' legal costs for work done up to the hearing of the settlement approval application, including costs anticipated but yet to be incurred as at the date of the Report; and
- (b) the lump sum amount of reasonable legal costs that the Court should approve as fair and reasonable and allow to be deducted from the settlement sum to be applied to payment of the legal costs of the Applicants and Group Members incurred in conducting the class action.

24. The Reference shall commence forthwith and:

- (a) the Costs Referee is to consider and implement the Reference without undue formality or delay so as to enable a just, efficient and cost-effective resolution of the Reference. This may include enquiries by telephone and direct communication, without intervention of lawyers, with any person who the Costs Referee believes may have relevant information. The Costs Referee may seek submissions from the Applicants' solicitors, and shall take any such submissions into account;
- (b) to facilitate the just, efficient and cost-effective resolution of the Reference the Costs Referee is to make such directions as the Referee considers appropriate as to the conduct of the Reference, including for the attendance of any person, the production of documents and records relevant to legal costs, and/or the provisions of any submissions;
- (c) the Applicants' solicitors shall forthwith and without delay deliver to the Costs Referee a copy of this order. The Applicants' solicitors shall immediately make available all information and records which the Costs Referee believes are relevant to the Reference; and
- (d) the Costs Referee, the Applicants shall have liberty to seek directions with



respect to any matter arising in the Reference upon 24 hours' notice, or such other notice ordered by the Court.

25. The Costs Referee shall submit the Report to the Court in accordance with r 28.66 of the *Federal Court Rules 2011* (Cth) (the **Rules**), addressed to the chambers of the Honourable Justice Murphy on or before 4.00 pm on 16 February 2024.
26. The Costs Referee shall provide a copy of the Report to the Applicants' solicitors.
27. The costs of and incidental to the appointment of the Costs Referee and the Costs Referee's reasonable costs shall be paid by the Applicants' solicitors, but otherwise, subject to further order, shall be costs in the proceeding.
28. Unless the Court otherwise orders, the Costs Referee's fees shall be not more than \$10,000.

Approval Application

Timetable for parties

29. By 4:00 pm on 21 February 2024, the applicant shall file and serve the Approval Application.
30. By 4:00 pm on 28 February 2024, the applicant shall file and serve any evidence upon which they intend to rely in support of the Approval Application. The evidence shall include material including:
 - (a) whether the Proposed Settlement is fair and reasonable in the interest of class members and as between class members;
 - (b) the proposed scheme for the distribution of the settlement among class members;
 - (c) the applicant's costs and disbursements in conducting the proceedings;
 - (d) a cost review report prepared by an independent cost referee appointed by the Court.
31. By 4:00 pm on 28 February 2024, the applicant shall file and serve his outline of submissions in support of the Approval Application.
32. By 4:00 pm on 8 March 2024, the respondent shall file and serve any evidence and outline of submissions on which it wishes to rely.



Objections to the Proposed Settlement

33. By 4:00 pm on 29 January 2024 (**Objection Deadline**), any group member who wishes to oppose the Proposed Settlement shall file and serve a completed Notice of Objection to Proposed Settlement (**Notice of Objection**) in the form of Schedule 2 to the Notice of Proposed Settlement by sending it to the Court and the Applicant:
 - (a) by email or by post to the Victoria District Registry of the Federal Court at vicreg@fedcourt.gov.au or Federal Court of Australia (VIC Registry), 305 William Street, Melbourne VIC 3000; and
 - (b) by email or by post to the applicant at hayscoalaction@aderolaw.com.au or Adero Law, 3 Hobart Place, Canberra ACT 2601.
34. By 4:00 pm on 31 January 2024, the Applicant must provide a copy of all Notices of Objection received in accordance with Order 33 to the Respondent by delivering the same to the Respondent's solicitors.
35. If on or before the Objection Deadline the solicitors for any party receive a notice purporting to be a Notice of Objection which has not also been sent to the Victoria District Registry of the Federal Court, the solicitors must file the Notice in the Victoria District Registry of the Federal Court within two business days after receipt, with a notation as to the date of receipt. Any such notice shall be treated as a Notice of Objection received by the Court at the time it was received by the solicitors.
36. The solicitors for the Applicant and the Respondent each be granted leave to inspect the Court file and uplift for the purpose of copying any Notices of Objection.



Approval Application Hearing

37. The Approval Application be listed for hearing on 18 March 2024 at 10:15 am AEDT.

Interim regime for confidentiality

38. Any affidavit, annexure, exhibit or submissions in respect of which a confidentiality order will be sought will be suppressed upon filing, until further order.
39. The parties are excused from any requirement to serve any document filed in accordance with Order 32 above..
40. To the extent that any affidavit, annexure, exhibit or submissions is only partly confidential, the parties shall file and serve a redacted copy of the documents redacting only those parts that are claimed to be confidential. Blanket claims of confidentiality must be avoided. Any confidentiality claims should be targeted and appropriately calibrated. Overly broad claims of confidentiality will face a risk that the claim will be refused, without an opportunity to revise the breadth of claim.
41. Any application for confidentiality orders in respect of any document filed in accordance with order 38 above will be determined as part of the determination of the Approval Application.
42. The parties are to include in their submissions a schedule identifying the parts of the documents to which confidentiality orders are sought. They shall also provide the chambers of Justice Murphy with versions of the documents highlighting (but not redacting) the parts of the documents to which the confidentiality orders are sought, differentiating between those parts where confidentiality is sought without time limit (such as any confidential opinion of counsel) and those parts where confidentiality is sought only until orders approving the proposed settlement are made and the expiry of the appeal period from those orders.

Miscellaneous

43. The parties have liberty to apply.

Date that entry is stamped: 18 December 2023

Sia Lagos
Registrar



ANNEXURE A

NOTICE OF PROPOSED SETTLEMENT

Lawrence Ridge v Hays Specialist Recruitment (Australia) Pty Limited (VID 1661/2018)

You should read this Notice carefully as it concerns your legal rights. You have been sent this Notice by order of the Federal Court of Australia because you may be a group member in the above proceedings. This notice is not legal advice. You should seek independent legal advice if you are unsure what to do, noting the time limits to register to participate or object to the proposed settlement.

SECTION 1 – INFORMATION ABOUT THE PROPOSED SETTLEMENT

What does the Proposed Settlement involve?

1. The parties participated in mediation on 7 September 2023.
2. At mediation, the parties agreed an in-principle settlement of the Class Action, which means that the parties agreed to resolve the Class Action out of Court without going to trial.
3. Without admission of liability, Hays has agreed to pay:
 - 3.1 \$825,000; and
 - 3.2 an additional \$6,329.11 per additional Group Member who registers by the deadline up to a total further amount of \$500,000 (**Settlement Sum**),in full and final settlement of the claims of the Applicant and all Group Members and inclusive of all costs, including legal and administration costs, expenses, disbursements, interest, tax and penalties. The Settlement Sum is paid by Hays without any admission of liability or wrongdoing and on a commercial basis to resolve the proceedings without the parties incurring further legal fees.
4. Although Adero Law estimates its costs in the proceedings to be \$529,729.22, Adero Law has agreed to cap its costs at 30% of the Settlement Sum. Adero Law will only be entitled to deduct costs from the Settlement Sum in an amount recommended by an independent Court-appointed costs referee and approved by the Court.
5. **If the proposed settlement is approved by the Court, the Class Action will be dismissed, and Registered Group Members may receive a payment from the Settlement Sum.**



6. If the Court approves the proposed settlement, the Applicant and all Group Members (whether Registered or Unregistered) will release Hays and its related entities from:

- all claims that are made against Hays by all Group Members in the Class Action; and
- to the extent permitted by law, all claims by Group Members that are in respect of, or arise out of, directly or indirectly, the same, similar or related circumstances to the claims made in the Class Action,

including any claim for compensation, damages, interest, other losses, pecuniary penalties, or costs.

7. This release does not effect any Group Members' individual claims which do not give rise to a substantial common issue of fact or law with the claims made in the Class Action.

As a Group Member, you will be bound by the proposed settlement if it is approved by the Court regardless of whether you have registered for the Class Action.

What is a Settlement Distribution Scheme?

8. The Settlement Distribution Scheme outlines the process by which the Settlement Sum is proposed to be paid to Registered Group Members on a fair and reasonable basis and must also be approved by the Court.

9. If the Court approves the proposed settlement, the Applicant will seek to have Adero Law appointed as the Administrator of the Settlement Distribution Scheme. If Adero Law is appointed as the Administrator, the Settlement Distribution Scheme will be available on its website.

Are Group Members liable for legal or other costs?

10. If the Court approves the Proposed Settlement, the Settlement Sum will be in full and final satisfaction of all costs. The legal costs incurred by the Applicant in pursuing the Class Action, in an amount approved by the Court, will be paid from the Settlement Sum prior to the distribution of any Settlement Payments to Group Members. This ensures that all Group Members who benefit will contribute to the legal costs and are treated equally.

11. The Applicant's costs are capped at a maximum of 30% of the Settlement Sum, and subject to a costs assessment by an independent Court-appointed costs referee. The



Applicant's costs are exclusive of any costs of administering the settlement under the Settlement Distribution Scheme. The Applicant will seek the Court's approval to deduct the costs of administering the settlement from the Settlement Sum.

12. You will not otherwise be required to pay any legal costs for the Class Action, regardless of whether you receive a Settlement Payment.

What is the settlement approval process?

13. The Court still needs to approve the Proposed Settlement. The Proposed Settlement does not come into effect unless it is approved by the Court.
14. The Court will determine whether it is fair and reasonable and in the interests of all Group Members. The Court will also determine whether the amount allocated for payment to Adero Law on account of legal costs and settlement administration costs is reasonable.
15. You may file a Notice of Objection to the Proposed Settlement and/or any aspect of the proposed distribution of the Settlement Sum to eligible Group Members. If you wish to file a Notice of Objection to the Proposed Settlement, you must do so by no later than 29 January 2024. The Court will take any objections into account in deciding whether or not to approve the Proposed Settlement.

How can I access confidential documents?

16. Upon signing a confidentiality undertaking, Group members may obtain a copy of certain documents which are to be kept strictly confidential including:
 - the Deed of Settlement and Settlement Distribution Scheme;
 - certain evidence and documents filed by the Applicant in support of the proposed settlement.
17. If you wish to obtain a copy of these documents, you must complete and return the Request for Inspection Form at Schedule 3 of this Notice of Proposed Settlement.

Where can I get more information?

18. If you have any questions or queries, you may contact the Applicant's solicitors, Adero Law, at hayscoalaction@aderolaw.com.au with the subject line: Proposed Settlement VID1661/2018.
19. If you are unsure of what to do, you should seek independent legal advice.



SECTION 2 – INFORMATION ABOUT YOUR OPTIONS

YOUR OPTIONS IF YOU ARE A REGISTERED GROUP MEMBER

20. If you have previously registered for the Class Action, you are a Registered Group Member and you have two options.

Option A: Do nothing (and you may participate in the proposed settlement)

21. If you wish to remain a Registered Group Member and participate in the Proposed Settlement, you do not need to do anything in response to this notice. **If the proposed settlement is approved by the Court, you may be eligible to receive a payment. You will be bound by the settlement and may need to provide certain information to the administrator.**

Option B: Object by 29 January 2024

22. You may object to the Proposed Settlement or any part of it by completing the Notice of Objection to Proposed Settlement Form attached as Schedule 2 to this Notice and submitting it to the Court and the Applicant's solicitors at the emails or postal addresses on the form **by no later than 29 January 2024**. If you choose to do this, you may still participate in the Proposed Settlement if it is approved by the Court.

23. Any objections received by the Court will be considered by the Court, along with any evidence and submissions filed by the Applicant and Hays, in determining whether or not the Proposed Settlement should be approved. If after considering any objections, the Court does not approve the Proposed Settlement, then the Class Action will continue. At or following a trial of the common issues, the Court may give directions in relation to the determination of any remaining issues.

YOUR OPTIONS IF YOU ARE AN UNREGISTERED GROUP MEMBER

24. If you have not previously registered to participate in the Class Action and you have not opted out of the Class Action, you are an Unregistered Group Member. You have three options.

Option A: Register to participate in the proposed settlement by 29 January 2024

25. You may register your claim by completing and submitting the Group Member Registration Form either online at <https://www.aderolaw.com.au/class-actions/mining/hays/> or completing the hard copy form attached as Schedule 1 to this Notice and returning it to Adero Law at the email or postal address on the form **by no later than 29 January 2024**.



26. **If you register, you may be eligible to receive a payment from the proposed settlement.** The precise amount of the payment is presently unknown and will be determined using a model as part of the Settlement Distribution Scheme. There is no cost associated with registering your claim.

Option B: Do nothing

27. If you do nothing and the proposed settlement is approved by the Court, you will remain a Group Member for all purposes and be bound by the settlement but:
- **you will not, unless the Court determines otherwise, be entitled to receive a payment from the proposed settlement.**

Option C: Object to the Proposed Settlement by 29 January 2024

28. You may object to the Proposed Settlement by completing the **Notice of Objection to Proposed Settlement Form** attached as **Schedule 2** to this Notice and submitting it to the Court and the Applicant's solicitors at the emails or postal addresses on the form **by no later than 29 January 2024**. If you choose to do this, you may still register your claim and participate in the Proposed Settlement if it is approved by the Court.
29. Any objections received by the Court will be considered by the Court, along with any evidence and submissions filed by the Applicant and Hays, in determining whether or not the Proposed Settlement should be approved. If after considering any objections the Court does not approve the Proposed Settlement, then the Class Action will continue. At or following a trial of the common issues, the Court may give directions in relation to the determination of any remaining issues.



SCHEDULE 1 – GROUP MEMBER REGISTRATION FORM
LAWRENCE RIDGE v HAYS SPECIALIST RECRUITMENT (AUSTRALIA) PTY LIMITED
(VID1661/2018)

Please return this form to:

By post: Adero Law, 3 Hobart Place, CANBERRA ACT 2601

OR

By email: hayscoalaction@aderolaw.com.au with subject line: Registration Form VID1661/2018

YOU MAY ALSO COMPLETE THIS FORM ONLINE

at <https://www.aderolaw.com.au/class-actions/mining/hays/>

The person named below gives notice that the person wishes to **REGISTER** for the Proposed Settlement of this proceeding.

Details of Group Member

Name of Group Member	
Date of Birth	
Telephone	
Email Address	
Postal Address	



SCHEDULE 2 – OBJECTION TO PROPOSED SETTLEMENT

**LAWRENCE RIDGE v HAYS SPECIALIST RECRUITMENT (AUSTRALIA) PTY LIMITED
(VID1661/2018)**

Please return this form to:

By post: Federal Court of Australia (VIC Registry), 305 William Street, Melbourne VIC 3000

and

Adero Law, 3 Hobart Place, CANBERRA ACT 2601

OR

By email: vicreg@fedcourt.gov.au with subject line: Notice of Objection VID1661/2018

and

hayscoalaction@aderolaw.com.au with subject line: Notice of Objection VID1661/2018

The person named below gives notice that the person **OBJECTS** to the proposed settlement of this proceeding.

Details of Objector

Name of Individual	
Telephone	
Email Address	
Postal Address	



Ground(s) of Objection

I am a Group Member in the above proceedings and I object to the Proposed Settlement of because *[set out below any submissions, attaching additional pages if necessary]*:

Signed	
Name of Person Signing	
Date	



SCHEDULE 3 – REQUEST FOR INSPECTION FORM

**LAWRENCE RIDGE v HAYS SPECIALIST RECRUITMENT (AUSTRALIA) PTY LIMITED
(VID1661/2018)**

Name of Individual	
Email Address	

Please sign below and send the completed Request for Inspection Form to:

By post: Adero Law, 3 Hobart Place, CANBERRA ACT 2601

OR

By email: hayscoalaction@aderolaw.com.au with subject: Inspection Request
VID1661/2018

I, _____ [*print full name*] undertake to the Federal Court of Australia to keep confidential, and not publish, disclose, or discuss the contents of the documents made available to me by Adero Law in connection with the proposed settlement of the Class Action, to any person or entity other than:

- a) any solicitor of Adero Law acting in the Class Action; or
- b) an Australian Legal Practitioner, for the purposes of seeking and receiving independent legal advice; or
- c) an accountant or financial adviser, for the purposes of seeking taxation advice.

I will not use the documents provided to me by Adero Law for any other purpose other than for considering my rights in the Class Action. I understand that this undertaking shall not apply in circumstances where I disclose the contents of the documents provided to me:

- a) after I have received written consent of Adero Law; or
- b) as required by law, or as ordered by the Court.

Signed _____

Witness _____

Date _____

Witness Name _____

Witness Date _____



ANNEXURE B
REGISTERED GROUP MEMBER COVER LETTER

Dear Registered Group Member

**CLASS ACTION – LAWRENCE RIDGE v HAYS SPECIALIST RECRUITMENT
(AUSTRALIA) PTY LIMITED (VID1661/2018)**

You are receiving this correspondence because you have previously registered for the Class Action.

The notice enclosed with this correspondence has been approved by the Federal Court of Australia. It provides you with important information about:

1. the proposed settlement of the class action; and
2. your right to object to the proposed settlement of the class action and/or any aspect of the proposed distribution of the settlement proceeds before the deadline of [date].

It is therefore very important that you read the enclosed Notice carefully.

If you have any questions, please visit the Class Action website at <https://www.aderolaw.com.au/class-actions/mining/hays/> or contact Adero Law directly at hayscoalaction@aderolaw.com.au.

Alternatively, you may wish to seek independent legal advice regarding the matters set out in this Notice.



ANNEXURE C
GROUP MEMBER COVER LETTER

Dear Group Member

**CLASS ACTION – LAWRENCE RIDGE v HAYS SPECIALIST RECRUITMENT
(AUSTRALIA) PTY LIMITED (VID1661/2018)**

You are receiving this correspondence because, based on the information available, you may have been employed by Hays at any stage between 21 December 2012 and 5 August 2022 and may be a Group Member in the Class Action.

The notice enclosed with this correspondence has been approved by the Federal Court of Australia. It provides you with important information about:

1. the proposed settlement of the class action;
2. your right to object to the proposed settlement of the class action and/or any aspect of the proposed distribution of the settlement proceeds before the deadline of 29 January 2024; and
3. what you need to do to register to participate in the proposed settlement of the class action before the deadline of 29 January 2024.

It is therefore very important that you read the enclosed Notice carefully.

If you have any questions, please visit the Class Action website at <https://www.aderolaw.com.au/class-actions/mining/hays/> or contact Adero Law directly at hayscoalaction@aderolaw.com.au.

Alternatively, you may wish to seek independent legal advice regarding the matters set out in this Notice.

