

# INTOWORK AUSTRALIA MODERN SLAVERY STATEMENT

## 1. Background

IntoWork Australia Limited and its Controlled Entities (IntoWork Australia) is a Group of companies operating under the IntoWork Australia banner.

This modern slavery statement is presented by IntoWork Australia and the following fully controlled subsidiaries of IntoWork Australia:

- IntoWork Australia Ltd coordinates the IntoWork Australia Group as appropriate, and primarily provides shared services to Group businesses.
- Help Enterprises a social enterprise helping people with disability lead fulfilling and independent lives.
- Gippsland Group Training Ltd, trading as AGA Apprenticeships Plus in Victoria, New South Wales and South Australia, is a Group Training Organisation (GTO), Registered Training Organisation (RTO), partner of MAS National for the delivery of Apprenticeship Network Provider services, and partner of IntoJobs to deliver Workforce Australia services.
- Hume Employment Service Ltd (Kestrel Recruitment) is a GTO) operating in North-east Victoria and Southern New South Wales and partners with Mas to deliver Apprenticeship Network Provider services in Victoria.
- Interact Australia Ltd operating in Victoria, Queensland, New South Wales, South Australia, Northern Territory and Tasmania, is a Disability Employment Service provider, a provider of Disability Community Services, and a registered service provider for the National Disability Insurance Scheme.
- MAS National Ltd and its Controlled Entities is an Apprenticeship Network Provider, servicing South Australia, Victoria, Queensland and Tasmania. MAS National partners with IntoJobs to deliver Workforce Australia services in Victoria, Western Australia, South Australia and New South Wales. Mas National also holds a number of government contracts across various states and provides WorkSafe consultation services in Victoria.
- Work & Training Ltd is a GTO, RTO and Foundations Skills service provider throughout Tasmania, and holds a number of government contracts.
- Capricornia Training Company Ltd is a service provider of the Youth Housing and Reintegration Services program across Central Queensland.
- MRAEL Ltd and its controlled entities operates in Queensland as a GTO, RTO, a Senior Vocational College, and partners with MAS National to deliver Apprenticeship Network Provider services in Queensland. MRAEL also partners with IntoJobs to deliver Workforce Australia services in Queensland.
- DGT Employment & Training (formerly Downs Group Training), is a GTO and RTO organisation in Queensland.
- Hospitality Training Network Ltd (HTN) operates as an apprenticeship employment organisation (GTO) for the tourism, hospitality and food service industries. HTN services New South Wales and the Australian Capital Territory.
- Skill Hire WA Pty Ltd operates in Western Australia as a GTO, RTO, Labor Hire and Transition to Work, and Workforce Australia provider.
- Nara Training and Assessing Pty Ltd operates in Western Australia as an RTO.
- GO2 Recruitment Pty Ltd operates in Western Australia and Queensland as a specialist labour hire and professional recruitment company.
- GO2 People Pty Ltd is a leading national provider of recruitment and labour hire services in Western Australia.
- Plus Recruitment Pty Ltd is the parent entity of the following businesses:
  - Stockdale Personnel Pty Ltd is a leading Print industry recruitment and labour hire company with offices in Melbourne and Sydney.
  - FindStaff Pty Ltd (previously known as Susan Rogan Child Care Services Pty Ltd) is a provider across many states of blue and white collar labour hire.

- Institute of Training and Further Education Pty Ltd is a quality national RTO delivering short and certificate courses.
- Hunter Executive Search Recruitment Pty Ltd operates nationally as an executive recruitment organisation.

IntoWork Australia had revenues during the 2024 financial year of \$360m and employees of circa 3,400.

## 2. Our Supply Chain

As a provider of employment, skills and education, and support services, we consider our supply chain to be relatively simple in comparison to many other industries. We work with a range of suppliers who provide goods and services across a number of different categories, such as IT and telecommunications, marketing, legal, property, facility management and other services. Therefore, we have close relationships with our suppliers.

While we believe that there is a relatively low risk of labour exploitation or other forms of slavery and human trafficking occurring within it, we are committed to preventing these practices from occurring within both our business and supply chain, which is demonstrated by our practices.

We undertook assessments of modern slavery risks in our supply chains over the reporting period to consider the risks that could contribute, or directly link to modern slavery practices with cleaning identified as an area of focus.

## 3. Policy on Modern Slavery

IntoWork Australia opposes all forms of slavery and forced labour and is committed to procurement practices that eradicate it from our current and future suppliers.

During the 2024 financial year, IntoWork Australia has continued to follow the Procurement Policy that governs how we manage the risks associated with procurement and ensure that procurement processes are transparent.

IntoWork Australia and its Group of businesses are committed to:

- identifying and taking actions to address modern slavery risks, and increasing transparency within our supply chains and business operations,
- providing information and instruction on human rights and ethical sourcing to staff involved in procurement and our suppliers,
- assessing the adequacy and effectiveness of actions taken by both our supply chains and business operations to manage the risk of modern slavery, and
- reporting of actions to assess and address modern slavery risks in our operations and supply chains as required under the Commonwealth Modern Slavery legislation.

Our approach to the risk of modern slavery is maintained and managed within the IntoWork Risk Register.

## 4. Due Diligence Processes for Modern Slavery

IntoWork Australia prohibits the use of all forms of forced labour and any form of human trafficking. We have a number of procedures in place in relation to our suppliers and employees to proactively manage any risk, including:

- Robust recruitment processes in line with Australian employment laws and encouraging employees to report any concerns.
- Maintaining close relationships with our existing suppliers and ensuring that suppliers agree to the IntoWork Australia policy on Modern Slavery through our supplier onboarding processes.
- All IntoWork and related entity employees have access to channels through which they may voice concerns, either through line managers, field officers, senior management, or human resources. IntoWork Australia is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made will be treated without fear of retaliation. It is by receiving and evaluating feedback and maintaining a culture of compliance that the Group can assess the effectiveness of its practices and procedures.

- IntoWork Australia supplies temporary personnel and apprentices to a number of clients. In this respect we have established procedures to ensure that those employees have a right to work in Australia. This involves asking the individual directly to confirm their right to work and maintaining documented evidence of this right to work.
- IntoWork Australia also ensures that where we are responsible for such temporary personnel whilst they are employed on our client's premises, they are free to leave their assignment on reasonable notice and operate under fair conditions. These conditions are inspected in advance of labour hire staff being provided to other companies.
- From 2024 annual communications will be implemented to ensure all IntoWork business leaders understand our commitment to the principles of modern slavery reduction and prevention.

If we were to find evidence that one of our suppliers or clients fails to comply with our Modern Slavery commitment, we would require the relevant party to remedy such non-compliance, and we would terminate our relationship should we see no timely improvement in the way their business is conducted.

In addition, regular suppliers to the IntoWork Australia Group of businesses are required to confirm that they oppose all forms of slavery and forced labour and are committed to providing such information and evidence to demonstrate this.

All suppliers that engage with IntoWork Australia are required to provide this confirmation to IntoWork in order to supply goods or services to the Group and we have seen a significant growth in the number of companies providing confirmation to IntoWork Australia.

In addition, we are currently in the process of transitioning from Vendor Panel to Folio a new Contract Management System which will enable us to continue to compile a repository of Modern Slavery policies from our key suppliers.

In 2023 we instigated contractual terms in high-risk service supplier areas to allow "open book" wage auditing, providing IntoWork the right to audit wages of supplier staff to ensure pay rates meet legislation requirements.

IntoWork Australia has a fact sheet on Modern Slavery. This provides a clear snapshot on what modern slavery is, which acts to educate those in Procurement of the risks and the importance of considering modern slavery within our supply chain.

## 5. Effectiveness of our actions

We will know the effectiveness of the steps that we are taking to ensure that slavery is not taking place within our business or supply chain if no reports are received from employees, clients, candidates, members of the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

We will regularly review the information provided by external sources such as the Global Slavery Index and similar evaluative resources for identifying potential risks to our commitment to modern slavery. We will work closely with our departments such as HR and the IntoWork businesses Contact Centre to identify any potential personnel at risk, or companies we work with who may have indicators of non-compliance with modern slavery principles. Such indicators will include concerns expressed by our staff in dealing with these companies, and any legal or media alerts to potential companies of concern.

## 6. Next Steps

In the years to come, IntoWork Australia will:

- Work to increase collaboration with internal and external stakeholders to prevent and address any contribution that we may have to the global issue of modern slavery. We will achieve this by focusing on raising awareness of the forms of modern slavery among our employees and suppliers, continuing to evolve our due diligence processes to aid in the identification of risks, reviewing existing processes and exploring ways to improve identification and action on risks throughout our supply chain;
- Ensure that all high risk contracts between IntoWork Australia and a supplier contain appropriate clauses relating to ethical workplace practices and modern slavery;
- Ensure existing suppliers are provided with the IntoWork Australia Supplier Code of Conduct;
- Continue to review the Global Slavery Index and other measures to confirm areas of vulnerability for our entities;

- Continue to invest in training of staff to enable IntoWork Australia and its Group of businesses to question suppliers and maintain a register of Modern Slavery policies from our suppliers, providing further transparency in the actions taken.

## 7. Approval

This statement is made pursuant to the Commonwealth Modern Slavery Act 2018 and constitutes IntoWork Australia's slavery and human trafficking statement for the financial year ending 30 June 2024.

During the reporting period this statement covers, IntoWork actively engaged and consulted with all companies within the Group during the development of this statement. We discussed the Modern Slavery Act 2018 reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

The Board of Directors has approved this statement.



Poul Bottern  
Group Chief Executive Officer

30 October 2024

### POLICY VERSION HISTORY

Rev.	Date	Description of Amendments	Amended By	Approved By
0	24/02/2021	Policy Creation	Procurement	Board of Directors
1.0	03/12/2021	Inclusion of new businesses and business descriptions. Updated Policy on Modern Slavery, Due Diligence and reference to the Modern Slavery fact sheet. Updated references to 2021.	Procurement	Board of Directors
2.0	30/11/2022	Update to IntoWork legal name, inclusion of new businesses and Vendor Panel, and updated references to 2022.	Procurement	Board of Directors
3.0	29/11/2023	Acquisition of GO2 by IntoWork occurred on 15 June 2023. GO2 People, GO2 recruitment, Skill Hire WA, NARA Training and Assessing, and Hunter Executive Search Consultants have been added to this document. Also added the statement from the Australian Border Force Modern Slavery Act Supplementary Guidance into our section on Supply Chain and made minor wording amendments.	Procurement	Board of Directors
4.0	30/10/2024	The merger of Help Enterprises, have been added to this document, along with updates to the contract management system, next steps and some minor wording amendments.	Procurement	Board of Directors