

## SCOPE

This statement applies to all individuals engaged with NW People Group Pty Limited (**NW People**) and its associated entities, including those working for, representing, or providing services to NW People in any capacity, such as consultants and third-party representative.

This statement, along with applicable codes of conduct to all workers, clients, partners and suppliers, who must always comply with the statement and associated policy requirements.

## MODERN SLAVERY POSITION

As a national supplier of workforce labour solutions throughout Australia, NW People takes its responsibility for supply of workers and managed workforce solutions extremely seriously and is aware of the potential for being targeted by traffickers and unlicensed labour hire providers.

NW People rejects any form of modern slavery practices including slavery, servitude, child labour, forced labour, human trafficking, debt bondage, slavery like practices, forced marriage and deceptive recruiting for labour services.

NW People recognises its businesses have an obligation to prevent slavery, slavery-like practices and human trafficking within its operations, supply chains and relationships, and is committed to implementing effective systems and controls to ensure modern slavery does not take place.

NW People respects the human rights of its employees, contractors, clients, suppliers, and business partners, and strives to identify and manage any risks related to these rights.

NW People is constantly striving to minimise the risk for any potential violations and are committed to taking effective steps towards preventing and mitigating harm to people in our operations, workforce, supply chains and business relationships.

## OPERATING STRUCTURE

NW People Group Pty Ltd, ABN 47 134 737 812, (“NW People” or “the Company”) is a privately owned and operated Australian proprietary company that provides contract, temporary and permanent recruitment, onsite and managed workforce solutions and payroll outsourcing services. NW People delivers tailored solutions for blue-collar, white-collar professional services and technical sectors across Australia.

NW People’s registered head office address is Unit 1/480 Victoria Street, Wetherill Park, NSW 2164.

NW People has office locations throughout the States of New South Wales, Victoria, Queensland, South Australia, Western Australia and the Australian Capital Territory. During 2024 NW People Group of companies employed over 4000 people nationally.

NW People delivers its services and solutions, via a legal entity and company structure established to support its divisional and national operations.

Effective February 2025, NW People comprises of the following businesses operating under the singular NW People legal entity:

- National Workforce
- NW Workforce
- NW Executive
- NW Health
- NW People
- NW People Group
- IRSO Recruitment / Deebel
- NW Professional Recruitment.
- NW Technology

In addition, the following businesses are owned or associated with National People Pty Ltd and as such are part of the 'Group' of NW People companies ('National Workforce Group'):

- N W Technology Recruitment Pty Ltd, ABN 50 665 202 344
- NW Labour Hire No 1 Pty Ltd, ABN 52 137 454 196
- NW Labour Hire No 2 Pty Ltd, ABN 36 149 524 318
- Labour Hire No 3 Pty Ltd, ABN 37 638 085 122
- Deebel Group Pty Ltd T/as IRSO Recruitment, ABN 38 611 985 365

This joint statement, addressing the requirements of all NW Peoples businesses (National Workforce Group) or associated entities, and is published in accordance with the Australian Modern Slavery Act 2018 (Cth) and applicable state and territory legislation (together, 'the Act').

This statement sets out the steps that NW People has taken during the 2024 financial year to prevent slavery and human trafficking in any of its workforce, operations, relationships, supply chains or any part of its businesses and to comply with its requirements under the Act.

All businesses within the NW People Group, have shared or common processes and approaches to assessing and managing modern slavery risk. NW People engaged with all Australian businesses to prepare this joint statement,

The Executive Leadership team was consulted, and this joint statement has been approved by the Chief Executive Officer overseeing and responsible for all NW People businesses and operations.

## **RISK IDENTIFICATION & MITIGATION**

### **Workers and Labour Hire**

NW People is involved in the sourcing and supply of workforce labour solutions and candidates for our clients.

This can involve the introduction by word of mouth referrals to NW People of candidates, or the direct introduction of candidates to our clients by NW People via direct sourcing activities.

Given the core activities of NW People, the greatest modern slavery risk identified relates to human rights risks, notably those related to forced labour and exploitation.

Accordingly, NW People has implemented procedures to recognise and mitigate modern slavery risks. All employees must provide sufficient evidence to satisfy working rights in Australia. Our system ensures that no one can be placed onto a job without suitable evidence being verified. The system will also monitor compliance with regular checks of visa status and expiries.

We have recently developed a recruitment and selection policy and manager training, along with existing candidate engagement practices to enable our workers, partners and clients to be alert to the signs of exploitation and modern slavery practices, so that effective and prompt actions can be taken if exploitation or modern slavery practices are identified in any of our operations, workforce, business relationships, operations or supply chain activities.

NW People is licensed as required under the various state and territory labour hire and contracting licensing schemes. NW People has also developed this statement and policy to mitigate the risk of modern slavery through education, training and a commitment to compliance with the Act.

NW People undertakes candidate pre-employment, qualifications and health checks and a rigorous onboarding program to ensure a safe working environment for all workers.

National Workforce regularly audits its employee policies and procedures to ensure compliance with relevant workplace and safety legislation, standards and regulations. This includes a Worker Code of Conduct and policies to support that all workers are treated in a fair and equal manner and with dignity and respect

NW Peoples worker policies prevent any form of discrimination, victimisation or harassment on any prescribed grounds under commonwealth, state or territory laws should be prohibited. This includes marital status, pregnancy, family responsibilities, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, religious belief, age, trade union activity or any other prescribed grounds.

NW People also has processes by which workers can raise concerns regarding their employment or other practices. NW People is committed to protecting workers when raising a complaint or issues and will ensure that all disclosures made in compliance with the whistleblowing policy will be treated confidentially and without fear of retaliation.

NW People also has a dedicated payroll team who audit the relevant modern award or enterprise agreement that a worker is engaged under to ensure they are paid correctly in accordance with the relevant award, agreement or individual contract.

## Suppliers

NW People acknowledges, as a consequence of contracting with other parties, whether as a client or as a supplier, there is always some risk that may contribute to modern slavery practices. The risk is also heightened given the nature of NW People's business activities, namely the provision of workforce labour solutions and candidates for our clients.

To reduce the Modern Slavery risk, NW People has implemented a due diligence process within our supply chain network that ensures compliance with the Act and forms part of our contractual relationship with suppliers.

NW People expects all clients, suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally compliant and professional manner by adhering to the NW People Supplier Code of Conduct. This code is regularly reviewed and updated to ensure compliance with the Act. The Supplier Code of Conduct is provided to all NW People suppliers.

We also expect our clients and suppliers to promote similar standards in their own supply chain. These expectations and standards include, at a minimum, that suppliers and potential suppliers shall:

- comply with all slavery and human trafficking laws including, but not limited to, the provisions of the Act and any applicable state legislation.
- not use any type of forced labour, bonded labour (work which is not for compensation received by the worker, but to repay a debt), child labour (where the labour is performed by a person who is not at least the minimum legal working age in the country in question or, if no such minimum age exists in that country, in accordance with International Labour Organisation Convention 138), or indentured labour (in which an employer forbids workers from leaving employment at the worker's discretion).
- respect the freedom of their workers to leave employment at their own free will and not restrict their movement by controlling identity papers or holding money deposits
- comply with the minimum legal working age in the jurisdiction in which they operate
- comply with the National Employment Standards (**NES**) (if relates to employees in Australia) and minimum wage entitlements
- ensure working hours are as per the NES and overtime hours are not excessive and are compensated accordingly
- All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to in all countries of operation, without any unauthorised deductions
- provide a workplace for its workers free from harassment, bullying and discrimination
- provide a psychically and psychologically safe and hygienic work environment
- treat workers fairly and in accordance with relevant anti-discrimination, equal opportunity and whistleblower legislation ; and
- All workers must be treated in a fair and equal manner and with dignity and respect.

Suppliers to NW People must ensure their business operations are free from slavery and human trafficking practices whether in Australia or elsewhere, both internally and within their supply chains and other external business relationships.

As part of our commitment to continuously assess and address Modern Slavery risks, NW People has developed a process to undertake due diligence on our supply chain network to ensure compliance with legislative obligations. To reinforce this expectation, compliance with the Act forms part of our contractual relationships with suppliers.

In contractually requiring our suppliers to fully comply with the Act, we expect that in the event of any actual or potential risk of breaching the Act, the supplier communicates this actual or potential risk to NW People.

This information is assessed and evaluated appropriately by relevant Executive Team Members on a continued basis. The sanctions available to remedy a breach or identified risk are to be set out in the contract terms, however such sanctions may include termination of contract or reporting the breach to the relevant external authority or body.

To support our supplier's compliance with the Act and the Supplier code of conduct, NW People participates on occasion in clients' audits of their respective supply chains. In doing so, National Workforce can observe its clients' own practices on the prevention of modern slavery and reduce risk.

## Operations

NW People contracts with third parties who provide services to assist with the everyday running of our businesses, such as IT service providers, HR Consultants, Trainers, travel and property management agencies etc.

NW People also regularly conducts quality assurance and due diligence activities to reduce the risk of Modern slavery including within its general operations including:

- conducting audits or assessments where a risk of Modern Slavery is identified internally
- participating in ISCO audits and accreditation process to ensure quality and compliance business and operational practices
- undertaking due diligence when engaging new suppliers, independent contractors or any other third-party representatives to assess and evaluate risks of Modern Slavery and the control procedures in place in relation to; ensure the risk of non-compliance is minimised
- providing avenues by which our workers, third party contractors, clients, partners can provide feedback on NW Peoples business practices, which fosters a culture of compliance.

## ACTIONS UNDERTAKEN IN PAST REPORTING PERIOD

Over this reporting period NW People has undertaken the following actions to address any modern slavery risks and/or non-compliance with the Act within our supply chain and operations and across of workforce. This includes:

- Reviewing our internal systems, operations and due diligence procedures
- Updating our Company Modern Slavery policy and statement based on feedback from the Australian Attorney Generals Office
- Commenced a review our existing Compliance, People & Culture policies and procedure

- Committed to the development of a training plan for all workers including Modern Slavery identification, awareness and risk mitigation
- Commenced a review of the Supplier Code of Conduct
- Commenced a review of the contractual terms of our supplier agreements
- Consulted with all NW Peoples businesses on the preparation of this statement and report submission
- Made our Executive Leadership Team aware of our Modern Slavery obligations and reporting requirements.

## ACTIONS PLANNED IN THE CURRENT REPORTING PERIOD

Looking forward, in the next 12 months NW People plans to:

- Update and finalise all compliance, people and culture policies and procedures, taking into consideration, NW People's, Modern Slavery obligations.
- Deploy the training plan for all workers with the aim to raise overall awareness of Modern slavery across the Company.
- Review the NW People procurement processes to ensure robust practices and risk mitigation strategies are embedded within our Request for Information and supplier due diligence processes.
- Audit and review our existing supplier contracts and update them with compliant contractual terms if required.
- Review internal and external Whistleblowing and Modern Slavery reporting processes.
- Develop a set of policies to support our external workforce, labour hire workers and candidates, where the highest risk of human rights or Modern slavery.
- Development and deploy a human rights policy that sets out how to identify, mitigate and report human rights risks.
- Participate in a ISO external audit and other continuous improvement activities.
- Review the existing risk management governance and reporting structure.

**This statement is made pursuant to the Act and constitutes NW Peoples slavery and human trafficking statement in respect of the 2023-24 reporting year and is approved by the CEO and Sole Director of NW People Group Pty Ltd.**

Signature:



**Name:** Jacqui Russell  
**Position:** CEO  
NW People Group Pty Ltd  
**Date:** September 2025

## DEFINITIONS

<p>Modern Slavery</p>	<p>Is a serious violation of an individual's dignity or human rights. Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. All forms of Modern Slavery involve the deprivation of a person's liberty by another to exploit them for commercial or personal gain.</p> <p>Practices that constitute Modern Slavery can include, but are not limited to:</p> <ul style="list-style-type: none"> <li>● slavery,</li> <li>● servitude,</li> <li>● child labour,</li> <li>● forced labour,</li> <li>● human trafficking,</li> <li>● sexual exploitation</li> <li>● debt bondage,</li> <li>● slavery like practices,</li> <li>● forced marriage</li> <li>● deceptive recruiting for labour services.</li> </ul>
<p>CEO</p>	<p>Chief Executive Officer</p>
<p>Client</p>	<p>Refer to a person or company to which NW People is providing a service to.</p>
<p>Supplier</p>	<p>Refers to a person who supplies goods or services to NW People (whether paid or unpaid) and any employees of the Supplier.</p>
<p>Supply Chain</p>	<p>Is defined as the products and services (including labour) that contribute to the NW People's business. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.</p>
<p>Workforce/worker</p>	<p>Refers to employees, directors, officers, agency workers, independent contractors and volunteers engaged or working on behalf of the Company.</p>



## GOVERNANCE

Applicable Standard(s)	<ul style="list-style-type: none"> <li>• ISO Standards- <a href="#">Global Standards for International Goods and Services</a></li> <li>• NES - <a href="#">National Employment Standards</a></li> </ul>
Supporting policy	Modern Slavery Policy
Supporting tools and documents	N/A
Associated policies	Code of Conduct, Supplier Code of Conduct, Conflict of Interest Human Rights, Occupational Health and Safety Policy, Recruitment and Selection, Equal Opportunity, Diversity, Equity and Anti-Discrimination,, Anti Bribery & Corruption, Whistleblower, Personal Relationships in the workplace
Related legislation	<ul style="list-style-type: none"> <li>• Modern Slavery Act 2018 (the Act)</li> <li>• Labour Hire Licencing Bill 2020 (ACT)</li> <li>• Labour Hire Licensing Act 2018 (Vic)</li> <li>• Labour Hire Licensing Act 2018 (Qld)</li> <li>• Labour Hire Licensing (Miscellaneous) Amendment Act 2018 (SA)</li> </ul> <p>Queries may be addressed to <a href="mailto:snovak@nationalworkforce.com.au">snovak@nationalworkforce.com.au</a></p>
Category	All individuals engaged with NW People and its associated entities, including those working for, representing, or providing services to NW People in any capacity, such as consultants and third-party representative.
Approval	Jacqui Russell 7 March 2025
Endorsement	NW People Group Executive Leadership Team 7 March 2025  Reviewed at February 2025 Monthly Group Leadership meeting
Policy owner	Head of People Experience
Date effective	7 March 2025
Review date	7 March 2027
Version	4.0
Content enquiries	<a href="mailto:snovak@nationalworkforce.com.au">snovak@nationalworkforce.com.au</a>