



**Peloton WorkReady**  
*Transforming Lives*

# Peloton WorkReady Policy for the Prevention of & Reporting on Modern Slavery

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STATEMENT FOR THE 2024–2025 REPORTING YEAR





## 1. Reporting Entity

This statement is made by Peloton WorkReady Pty Ltd (ACN 656 451 857) (“Peloton WorkReady”) in accordance with the reporting criteria set out in section 16 of the Modern Slavery Act 2018 (Cth). Peloton WorkReady is not currently required to report under the Act based on revenue thresholds. However, this statement is published voluntarily to formalise our commitment to ethical international recruitment and modern slavery risk mitigation.

Peloton WorkReady Pty Ltd is an Australian proprietary company headquartered in Western Australia. Peloton WorkReady operates in the international recruitment sector, facilitating the placement of skilled workers currently from the Philippines and the United Arab Emirates into employment in a growing list of destination countries which currently includes Australia, New Zealand, Canada, USA, UAE, Burkina Faso, Cote D’Ivoire, Kingdom of Saudi Arabia, Ireland, The United Kingdom and Mali. Peloton WorkReady also operates through Peloton WorkReady OPC in the Philippines, which partners with AMCAAJ International Recruitment Agency, a recruitment agency licensed and regulated by the Philippine Department of Migrant Workers (DMW).

## 2. Structure, Operations and Supply Chains

### Structure

Peloton WorkReady’s operational structure includes:

- Peloton WorkReady Pty Ltd (Australia)
- Peloton WorkReady OPC (Philippines)
- Peloton WorkReady FZE (UAE)
- Peloton RPL Centre Human Resources Consultancies LLC (UAE)
- Partnership arrangement with AMCAAJ International Recruitment Agency
- Engagement with other licensed DMW agencies in the Philippines, including Manpower Resources Asia (MRA) and International Skill Development Inc (ISD)
- Engagement with Absolute Immigration (International Migration Agent)

### Operations

Peloton WorkReady provides international recruitment services including:

- Candidate sourcing and screening
- Trade testing and skills verification
- Coordination of medical examinations
- Regulatory processing through DMW-licensed agencies
- Coordination of visa lodgement with licensed migration agents
- Pre-departure orientation
- Post-arrival aftercare support

Peloton WorkReady does not employ the workers placed with clients. Workers are employed directly by the client in the destination country.

### Supply Chains

Peloton WorkReady’s supply chains include:

- Licensed recruitment partners in the Philippines
- Trade testing materials and equipment providers
- Medical service providers
- Migration agents
- Professional advisers



- Technology service providers
- Office suppliers

### **3. Risks of Modern Slavery Practices**

Peloton WorkReady acknowledges that international labour migration is considered a high-risk sector globally.

Potential risks include:

- Charging of illegal recruitment fees
- Debt bondage
- Misrepresentation of employment conditions
- Coercion or deception
- Exploitation linked to visa dependency
- Third-party intermediary misconduct

Workers migrating across borders may be vulnerable due to:

- Financial pressure
- Limited understanding of destination country labour laws
- Language barriers
- Power imbalance with employers

Although Peloton WorkReady does not directly employ workers, we recognise that risks may arise through:

- Recruitment intermediaries
- Client employment practices
- Broader supply chain providers

### **4. Actions Taken to Assess and Address Risks**

#### **Zero Recruitment Fee Model**

Peloton WorkReady strictly prohibits the charging of recruitment fees to workers.

Workers are not charged for:

- Applications
- Placement
- Visa processing
- Medical coordination
- Trade testing
- Documentation
- Recruitment-related travel

Peloton WorkReady does not deduct recruitment-related costs from wages.

Where Peloton WorkReady incurs recruitment-related expenses, these are reimbursed by the client — not the worker.

#### **Licensed and Regulated Agency Partnerships**

All worker deployments from the Philippines are processed through recruitment agencies licensed by the Philippine Department of Migrant Workers (DMW).



Employment contracts are subject to Philippine regulatory review prior to departure as part of the overseas worker deployment process.

In addition, employment of workers in Australia occurs through visa programs administered by the Australian Government Department of Home Affairs. These programs impose regulatory requirements on employers, including sponsorship obligations, salary thresholds and compliance with Australian migration and workplace laws.

Where Peloton WorkReady facilitates worker placement into other destination countries, equivalent immigration and employment regulatory frameworks apply. These typically require employer sponsorship approvals, verification of employment conditions and compliance with applicable labour and migration legislation administered by the relevant government authorities in those jurisdictions.

Peloton WorkReady considers these regulatory frameworks in both source and destination countries to be important safeguards supporting ethical international recruitment and the protection of migrant workers.

### **Passport Protection**

Peloton WorkReady does not retain worker passports or identity documents. Workers remain in possession of their documents at all times.

### **Client Expectations**

Peloton WorkReady reinforces to clients that:

- Recruitment costs must not be recovered from workers
- Lawful wages and entitlements must be paid
- Return airfare must be funded where applicable
- Workers must be treated with dignity and fairness

Peloton WorkReady intends to strengthen contractual clauses in future recruitment agreements to explicitly reflect these expectations.

### **Aftercare and Reporting**

Peloton WorkReady maintains an aftercare program encouraging workers to raise concerns regarding workplace treatment.

Workers may escalate concerns to:

- Peloton WorkReady management
- Licensed recruitment partners
- The Philippine Labor Attaché
- The Philippine Embassy or Consulate

Retaliation against workers who raise concerns is not tolerated.

### **Staff Training Commitment**

Peloton WorkReady commits to implementing structured internal training for relevant staff on:

- Modern slavery risk indicators
- Ethical recruitment principles
- Worker vulnerability indicators
- Escalation procedures

## **5. Assessing Effectiveness**

Peloton WorkReady assesses the effectiveness of its actions by:



- Monitoring worker feedback
- Tracking complaints or grievances
- Reviewing partner performance
- Reviewing regulatory compliance outcomes
- Conducting annual internal policy review

Future development of measurable KPIs will be explored as operations expand.

## **6. Consultation**

This statement was developed in consultation with:

- Peloton WorkReady Pty Ltd leadership
- Peloton WorkReady OPC
- Operational management involved in Philippine deployments

Peloton WorkReady will continue to consult with relevant operational partners in future reporting cycles.

## **7. Other Relevant Information**

Peloton WorkReady's corporate vision is:

“To transform lives and businesses through ethical international recruitment.”

We recognise that ethical labour mobility is foundational to sustainable international recruitment and remain committed to continuous improvement of our governance framework.

## **Approval**

This statement was approved by the principal governing body of Peloton WorkReady Pty Ltd on **1 January 2026**.

Signed: **Brett McPhee**

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Chief Executive Officer

Peloton WorkReady Pty Ltd