

# MODERN SLAVERY STATEMENT

## 1. Background

Inner Northern Group Training Limited and Controlled Entities (IntoWork Australia) is a Group of companies operating under the IntoWork Australia banner and is comprised of the following companies:

Inner Northern Group Training Ltd coordinated the IntoWork Australia as appropriate and primarily provides shared services to Group businesses.

Gippsland Group Training Ltd is a Group Training Organisation (GTO), Registered Training Organisation (RTO) and partners with MAS National to deliver Apprenticeship Network Provider services in Victoria.

Interact Australia Ltd 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 holds a number of government contracts and also provides Worksafe Consulting services.

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 GTO and service provider of the Youth Housing and Reintegration Services program.

MRAEL Ltd operates in Queensland as a GTO, RTO, a Senior Vocational College and partners with MAS National to deliver Apprenticeship Network Provider services in Queensland.

Plus Recruitment Pty Ltd is the parent entity of the following entities:

- 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 of blue and white collar labour hire as well as high quality experienced educators for child care centres as well as nannies for families.
- Institute of Training and Further Education Pty Ltd is a quality RTO delivering short and certificate courses.

IntoWork Australia had revenues during the 2020 financial year of \$149m and employees of circa 1000.

## 2. Our Supply Chain

As a provider of recruitment, training and apprenticeship services we consider our supply chain to be relatively simple in comparison to many other industries. We work with a small 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.

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

## 3. Policy on Modern Slavery

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

IntoWork Australia has during the 2020 financial year approved a procurement policy that governs how we manage the risks associated with procurement and ensure that procurement processes are transparent, objective and as well as highlighting the importance of protecting human rights and those who may be impacted by our procurement activities and selection of suppliers. Procurement activities are governed by this policy.

Our on boarding of suppliers requires them to confirm their commitment to abiding by IntoWork Australia's principles social responsibilities.

#### **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 employees to proactively manage any risk, including robust recruitment processes in line with Australian employment laws and encourage employees to report any concerns.

All employees have access to channels through which they may voice concerns, either through line managers, field officers, senior management or through human resources. IntoWork Australia is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in 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.

As part of our own business 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 view their right to work.

In addition we ensure 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.

In the event that we were to find evidence that one of our suppliers or clients has failed to comply with the Modern Slavery then we would require the relevant party to remedy such non-compliance and we would consider terminating our relationship should we see no improvement in the way their business is conducted.

#### **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

#### **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.

#### **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 2020.

The Board of Directors has approved this statement.

A handwritten signature in black ink that reads "Poul Bottern".

Poul Bottern  
Group Chief Executive Officer

24 February 2021